EXHIBIT A

PCB PRESENTATION

TO

CORPORATE DEVELOPMENT COMMITTEE

I. INTRODUCTION:

We are here today to acquaint you with the PCB (Aroclor) pollution problem and to secure your guidance and approval on a recommended plan of action.

The problem is that Certain PCB's have recently been identified by various scientists along with DDT in fish, birds, and other wildlife.

From the standpoint of reproduction, the PCB's are highly toxic to birds. In a few moments, Elmer Wheeler will describe the problem in detail.

Our objective is to describe for you the basic problems, the issues involved, review alternative courses of action, and suggest an action plan program for your approval.

This is a serious matter, not only from the pollution viewpoint, but also because of the $22 M worldwide customer business involved with resultant gross profits of $10 M and a net investment of approximately $9 M. In addition, there could be possible adverse legal and public relations problems leveled against Monsanto.

Our Agenda will be as follows:

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CV96-J-0440-E
DATE 04/02/01
PLFF EXHIBIT NO. 105

PCB AGENDA REVIEW

I. INTRODUCTION

II. THE PROBLEM
- DEVELOPMENTS INCRIMINATING PCB's
- COMPLEXITY OF IDENTIFICATION
- NATURE OF
- SERIOUSNESS

III. LAW DEPARTMENT VIEWPOINT AND RECOMMENDATIONS

IV. EFFECT ON MONSANTO AND ALTERNATIVES

V. FUNCTIONAL FLUID BUSINESS GROUP DISCUSSION
- MARKETS, USES
- SOURCES OF POLLUTION
- CUSTOMER EFFECT

VI. PLASTICIZER BUSINESS GROUP DISCUSSION
- MARKETS, USES
- SOURCES OF POLLUTION

VII. RECOMMENDED ACTION PLAN

VIII. SUMMARY

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By way of introduction, the Organic Division and the Medical Department has been actively engaged for the last 18 months in developing facts and knowledge on this subject by personal visits to Universities and Industrial test laboratories, other worldwide producers, and other industrial collaborators, as well as keeping abreast of all literature and news sources on the subject as well as funding a toxicological and analytical test program in excess of $200 M. We established an Ad Hoc Committee of both Business Groups and Medical which recently issued a report - much of which will be discussed today. We have learned a lot, but there is much yet to learn as you will hear.

What are PCB's? They are polychlorinated biphenyls - better known to us as Aroclors. The next slide will quickly re-familiarize you with our Aroclor business.

MONSANTO WORLDWIDE AROCLOR BUSINESS

POUNDS/YEAR	104 M (70 M in Functional Fluids 34 M in Plasticizers)
SALES/YEAR	$22 M ($16 M in Functional Fluids $ 6 M in Plasticizers)
GROSS PROFIT/YEAR	$10.0 M ($7.5 M in Functional Fluids $2.5 M in Plasticizers)
GROSS INVESTMENT	$13 M ($8.8 M net investment)
ROI	10.5%
WORLDWIDE M/I	62%
MONSANTO PRODUCTION LOCATIONS:	USA (2 plants, Anniston, Alabama Sauget, Illinois)
	UK (Newport)
	JAPAN (Yokkaichi)
OTHER PRODUCERS:	Bayer, Prodelec, Caffaro, Flick, Kanegahuchi, and several Eastern European producers (all ex-USA)

ex UK

THE AROCLOR PRODUCT LINE

CHEMICAL NAME	TRADE NAME	NATURE OF MATERIAL
MONOCHLOROBIPHENYL	AROCLOR 1221	THIN LIQUID
DICHLOROBIPHENYL	AROCLOR 1232	↓
TRICHLOROBIPHENYL	AROCLOR 1242	OILY LIQUID
TETRACHLOROBIPHENYL	AROCLOR 1248	↓
PENTACHLOROBIPHENYL	AROCLOR 1254	HEAVY MOLASSES
HEXACHLOROBIPHENYL	AROCLOR 1260	THICK TAR
HEPTACHLOROBIPHENYL	AROCLOR 1262	↓
OCTACHLOROBIPHENYL	AROCLOR 1268	↓
DECACHLOROBIPHENYL	AROCLOR 1270	SOLID
TERPHENYLS	SANTOWAX	↓
CHLORINATED TERPHENYL	AROCLOR 5460	SOLID

There are theoretically 210 different isomers of chlorinated biphenyls.

Monsanto entered the Aroclor market in 1930 by acquiring Swan Chemical Company. The first load of Aroclor went out of Anniston, Alabama to General Electric in 1931. Since then, the market has grown to one of Monsanto's most profitable franchises. This franchise is now being threatened not by competition but by recently found pollution problems which Elmer Wheeler will now discuss.

II. The Problem (Wheeler) - see attached Appendix A

III. Law Department Viewpoint and Recommendations (French)

IV. Effect on Monsanto and Our Alternative Courses of Action

As discussed, Aroclors 1254 and 1260 -- the 5 and 6 Cl ringed biphenyls are the ones most seriously involved in the pollution problem. Both Plasticizers and Fluids Groups are involved as shown:

AROCLOR SALES

(M POUNDS)

	FLUIDS	PLASTICIZERS	TOTAL
AROCLOR 1254	1.45	5.4	6.85
AROCLOR 1260 & ABOVE	3.7	1.7	5.4
	5.15	7.1	12.25

We considered 4 alternative courses of action:

(Slide)

Alternative 1: Do nothing was considered unacceptable from a legal, moral, ~~and~~ customer & public relations & company policy viewpoint. This is also the quickest route to being forced out of business.

Alternative 2: Go out of total Aroclor business was considered unacceptable from a Divisional viewpoint, but from a Corporate viewpoint may be necessary. ~~Only you can make that decision.~~ All Aroclor products are not serious pollutants - many degrade; there is too much customer/market need and selfishly too much Monsanto profit to go out. To go out would require a write off of Aroclor net investment of $7 M (10¢/share) or if biphenyl included $8.8 M (12¢/share). In addition, inventory disposition, continuing cost of utilities, and back-up capital and serious manpower & resources reallocation at Anniston.

Alternative 3: Go out of Aroclor 1254 and 1260. This was seriously considered and may eventually occur by our actions and customer actions, nevertheless, we feel that segments of this business are defensible or are so "confined" in use that specific plans of action are called for this portion. Our reasons for eliminating this alternative will become clearer as we outline our action plans.

ALTERNATIVE COURSES OF ACTION

1. DO NOTHING - JUST REACT TO LEGISLATION AND EMOTION.
2. GO OUT OF TOTAL AROCLOR BUSINESS.
3. GO OUT OF AROCLOR 1254 AND 1260 PRODUCTION
4. DEVELOP SPECIFIC ACTION PLANS "TAILORED" TO EACH BUSINESS GROUP AND EACH CUSTOMER/MARKET SITUATION TO "CLEAN UP" THE MESS.

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Alternative 4: Develop specific action plans tailored to each Business Group and each customer/market situation, - was the alternative selected at this point of time and based on our knowledge from a Divisional viewpoint as making Monsanto act in the most positive, responsible way to society and our customers, as well as our interests.

However, because of the magnitude and seriousness of this problem and its total implications for Corporate Monsanto, your plan your guidance and approval is needed. ~~the final decision on this matter must be made by the CPC~~.

V. Functional Fluids Business Group Discussion:

Aroclors are used widely in 3 of our 4 market areas in the Fluids Group:

FLUIDS USE OF AROCLORS BY MARKET AREA

AROCLOR PRODUCT	DOMESTIC MARKET AREA			TOTAL
	INDUSTRIAL	HEAT TRANSFER	ELECTRICAL	
1242	4.1	1.1	36	41.2
1248	1.2	1.0	-	2.2
1254	-	0.1	0.8	0.9
1260 & Above	0.6	-	3.5	4.1
	5.9	2.2	40.3	48.4

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SOURCES OF FLUIDS POLLUTION

APPLICATION	INTENSITY OF POLLUTION	
INDUSTRIAL FLUIDS	GREATEST	(DIRECT)
DIELECTRICS	↓	(INDIRECT CONTAINED)
HEAT TRANSFER	↓	(INDIRECT CONTAINED)
PRODUCING PLANTS	LEAST	(DIRECT)

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FLUIDS CUSTOMER ALTERNATIVES

AREA OF APPLICATION	PRODUCT OF CHOICE	CUSTOMER OPTIONS
Industrial Fluids	Pydraul 312/F-9/ A-200/Phosphate Esters/ Water Glycol	Customer could get along without us, but Pydraul 312 favored. H_2O Glycol has some pollution problems. Phosphate ester route ok at present.
Transformer	Air/Oil/Aroclor/Gas	Could drop Aroclor at sacrifice of safety, cost or size of equipment or noise level.
Capacitors	Aroclors	No immediate replacement available. Longer term - oil at expense of size and cost of efficiency and redesign of equipment.
Heat Transfer	Therminol	No option for FR liquid market. Other system possibility.
	Oil/Dowtherm/T66 T55 T77 T88	Liquid systems favored. T66 and T55 increasing rapidly in use. Oil also a pollution problem.

Customer Choices & Alternatives & Penalties:

Summarizing, some of our customers have no immediate alternative, some could change only at sacrifices of safety, or cost or various technical factors. Only in the Industrial field could the customer make an immediate conversion.

PCB Threat to Functional Fluids Business and Profit:

FLUIDS BUSINESS THREATENED

(1970 BUDGET)

PROBLEM	SALES	GROSS PROFIT
1. Confined to A-1254/ 1260 only.	$ 3.0 M	$1.36 M
2. Spreads to A-1242 and 1248		
First to: a) Industrial Fluids	$ 4.0 M	$1.6 M
Then to: b) Dielectric Fluids	$ 8.0 M	$3.8 M
Then to: c) Heat Transfer	$ 1.0 M	$ .6 M
	$16.0 M	$7.36 M

— Turn over to Jim Harrington

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PLASTICIZERS (WORLD-WIDE)

	ALL AROCLORS	AROCLOR 1254/1260 TYPE
1969 SALES, DOLLARS	$ 6.0 M	$1.7 M (28%)
POUNDS	34.0 M	9.5 M (28%)
GROSS PROFIT	$ 2.5 M	$0.8 M (32%)

COMMENTS: DISTINCTIONS FROM F.P.

1. Large number of direct U.S. customers - 570.
2. Customers are small: 23 direct customers - 47% A-1254/1260 sales.
3. 50% domestic A-1254/1260 sales through distributors - difficult to police.

MARKETS	1968 SALES	MAJOR AROCLOR USED
Carbonless Carbon Paper	8.8 M lb.	Aroclor 1242
Hot Melt Adhesives	5.7 M lb.	Aroclor 5460
Swimming Pool Paints	1.7 M lb.	Aroclor 1254) Aroclor 5460)
Protective Coatings	5.3 M lb.	Aroclor 1254) Aroclor 5460)
Emulsion Adhesives	1.5 M lb.	[illegible] Aroclor 1260)
Sealants	3.0 M lb.	Aroclor 1254) Aroclor [illegible])
Wax Modification	2.0 M lb.	Aroclor [illegible] Aroclor 5460)
Miscellaneous	5.0 M lb.	Aroclor [illegible]) Aroclor 125[illegible])

COMMENTS: 1. [illegible] major customer (85% of Aroclor 1242 sold .

2. [illegible] of domestic Aroclors sold through [illegible] distributors.

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POSSIBLE CONTAMINATION SOURCES

(PLASTICIZERS)

DEGREE OF CONTAMINATION	MARKET	APPLICATION	SOURCE	IS A-1254 /1260 USED?
Most	Coatings	Marine Paints) Water tank linings)	Leaching	Yes
	Coatings	Swimming Pool Paints	Leaching	Yes
	Carbonless Carbon Paper	-	Vaporization	No
	Wax Modification	-	Vaporization	Yes
	Emulsion Adhesives	-	Contact with product via packaging. Incineration.	Yes
	Hot Melt Adhesives	-	Contact with product via packaging. Incineration.	No
Least	Sealants	Automotive Construction Joint Sealants	Long-term leaching	Yes

COMMENTS:

1. Unlike fluids, Aroclor plasticizers are combined into plastics to produce the final product - therefore, far less mobile.
2. Problems such as wastes from our manufacturing plants, customers plants and and leasing of drums common to both groups.
3. Exterior protective coatings are not considered a high potential source.
4. Volatilization of Aroclors during plant processing or [illegible] product. Rain will wash vapors back to earth.

PLASTICIZER BUSINESS THREATENED

PROBLEM	SALES RETAINED*	$ G.P. RETAINED (LOST)
1. Confined to A-1254/1260 type only.	$4.3 M	$1.7 M (-$0.8 M)
2. Spreads to all chlorinated biphenyls.	$2.0	$0.6 M (-$1.9 M)
3. Spreads to all PCB's and all chlorinated terphenyls	0.0	0.0 (-$2.5 M)

*Based on 1965 prospects.

COMMENTS: Plasticizers sell Aroclor 1262/4465 which are very close to A-1254/1260 and these have been included as A-1254/1260.

RECOMMENDED ACTION PLAN

THE JOINT ACTION PLAN DEVELOPED BY THE FUNCTIONAL FLUIDS AND PLASTICIZER BUSINESS GROUPS, AND THE MEDICAL AND LAW DEPARTMENTS IS AS FOLLOWS:

1. Appoint a Project Manager - responsible for the overall management of the Aroclor pollution problem. He would be assisted by a Task Force from members of each Business Group plus Medical, Law, Engineering and Manufacturing.

2. Notify all Aroclor customers of PCB problem and relabel containers - within 60 days.

3. Clean up Monsanto plants' effluents within 12 months.

4. Develop and implement new packaging systems for Aroclor 1254/1260 - within 6 months.

5. Educate customers on need for clean-up at their plants - within 4 months.

6. Introduct to market, replacement products for Aroclor 1254/1260 - beginning 1/1/70 (Fluids), 4/1/70 (Plasticizers).

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RECOMMENDED ACTION PLAN

7. Continue and expand biodegratation test program with Aroclor series, particularly 1242, 1248 and 1254.

8. Continue toxicological test program.

9. Accelerate present analytical test program.

10. Determine feasibility and cost of eliminating 5/6 Cl_2 in Aroclors 1242 and 1248. (3/70)

11. Study incineration products. (3/70)

12. Develop business plan to offer:

    Monsanto Fluid Reclamation and Recovery with Enviro Chem (4/70). (Reclamation already underway at Findett.)

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WHAT COULD WE EXPECT FROM THIS PROGRAM?

Through this action program, Monsanto would expect to:

1. Retain or convert a good portion of our business and profits:

PROBLEMS	CONVERT OR RETAIN	$M SALES OUT OF PRESENT	ODDS OF SUCCESS
a. Confined to A-1254/ 1260.	$20.3 M	$22 M	70%
b. Spreads to A-1248 and 1242.	$10 M	$22 M	60%

2. Gain further valuable knowledge and time to:
   a. Learn more facts.
   b. Protect our position.
   c. Make further decisions regarding our program.
   d. Contribute to overall pollution knowledge.
3. Clean-up the major contributing PCB pollution factors.
4. Minimize customer complaints and hardships.

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of 25

The Program Would:

1. Cost some money.

   Est. SARE - $400-500 M

   Est. Capital - $700 M

   $1.1 M - 1.2 M

2. Expose us to continued adverse publicity and possible law suits.

3. Cause some customer discontent - but much less than an abrupt termination of production.

EXHIBIT B

October 11, 1937.

Experimental work in animals shows that prolonged exposure to Aroclor vapors evolved at high temperatures or by repeated oral ingestion will lead to systemic toxic effects.

Repeated bodily contact with the liquid Aroclors may lead to an acne-form skin eruption.

Suitable draft ventilation to control the vapors evolved at elevated temperatures, as well as protection by suitable garments from extensive bodily contact with the liquid Aroclors, should prevent any untoward effect.

In talking with Dr. Kelly before these three paragraphs were written, we agreed that they might as well be phrased so that they could be used not only in the Aroclor booklet, but quoted in correspondence as that may be necessary.

L.A. Watt

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Attachment 3-2

3.2

EXHIBIT C

COPY

Dr. D.V.N. Hardy
Dr. H.R. Newman.

Monsanto Chemical Company

St. Louis, Missouri

September 20, 1955

Dr. J.W. Barrett

London

Your memo September 8 to Mr. Nason

AROCLOR TOXICITY

Howard Nason has given me your memo of September 8. I will be happy to discuss this with Dr. Newman during his visit here. I think, however, there are several points that I can answer you now.

You comment upon the difference in toxicity between Aroclor 1254 and 1242. This is not particularly surprising because in the earlier work it was found that toxicity increased with chlorination. Of course, from the standpoint of volatility in the case of inhalation or absorption from the gut from the point of view of ingestion are important. Frankly, there was not too great a difference between the two compounds, however. As you know, the maximum allowable concentrate is 0.1 ml/cubic meter in the case of 1254, and as high as 10.0 mgm in the case of 1268. I think the former is too low and the latter is too high. In this country they don't use the MACs very routinely, but certainly in England I think it would be alright to consider 0.2 mgm/cubic meter as perfectly safe.

I don't know how you would get any particular advantage in doing more work. What is it that you want to prove? I believe your work should be directed towards finding out what the concentrations are of Aroclor during different operations whether it is industrial or painting. The reports you have seen from Kettering Laboratory are the result of approximately $15,000 to $20,000 expenditure by MCC.

MCC's position can be summarized in this fashion. We know Aroclors are toxic but the actual limit has not been precisely defined. It does not make too much difference, it seems to me, because our main worry is what will happen if an individual developes any type of liver disease and gives a history of Aroclor exposure. I am sure the juries would not pay a great deal of attention to MACs.

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We, therefore, review every new Aroclor use from this point of view. If it is an industrial application where we can get air concentrations and have some reasonable expectation that the air concentrations will stay the same, we are much more liberal in the use of Aroclor. If, however, it is distributed to householders where it can be used in almost any shape and form and we are never able to know how much of the concentration they are exposed to, we are much more strict. No amount of toxicity testing will obviate this last dilemma and therefore I do not believe any more testing would be justified.

Let's see what our discussions with Dr. Newman and yourself bring out.

R. Emmet Kelly, M.D.

REK:k

EXHIBIT D

From MONSANTO CHEMICAL COMPANY

At St. Louis

cc Mr. J. Cresce -Krumm. Plt
Mr. E. W. Lieben -" "
Mr. R. M. Webber -" "

CONFIDENTIAL Date November 14, 1955

To Mr. H. B. Patrick Reference

At Krummrich Plant Subject DEPARTMENT 246 (AROCLORS)

It is the opinion of the Medical Department that the eating of lunches should not be allowed in this department for a number of reasons.

(1) Aroclor vapors and other process vapors could contaminate the lunches unless they were properly protected.

(2) When working with this material, the chance of contaminating hands and subsequently contaminating the food is a definite possiblity.

(3) It has long been the opinion of the Medical Department that eating in process departments is a potentially hazardous procedure that could lead to serious difficulties. While the Aroclors are not particularly hazardous from our own experience, this is a difficult problem to define because early literature work claimed that chlorinated biphenyls were quite toxic materials by ingestion or inhalation. In any case where a workman claimed physical harm from any contaminated food, it would be extremely difficult on the basis of past literature reports to counter such claims.

Jack T. Garrett

Jack T. Garrett

JTG:SMB

PLAINTIFF'S EXHIBIT 4403

PENGAD-Bayonne,NJ

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EXHIBIT E

St, Louis, Missouri

January 21, 1957

Messrs.:
G. R. Buchanan - Robts.
R. E. Hatton - M.C.
F. H. Langenfeld-Robts.
H. S. Litzsinger-Robts.
O. R. Sido-Washington,D.

Mr. H. I. Armstrong

Roberts Building

FYDRAUL 150

Dr. Treon and I spent an afternoon with the Navy people to discuss Fydraul 150. Those present were Captain Shone, Captain Alvis, Captain Sessions, Commander Siegel and Mr. Mickey Albert. They discussed their information concerning Fydraul 150 which was obtained at the Naval Institute of Medical Research. While reports were not available, they had the following general data:

Skin applications of Fydraul 150 caused death in all of the rabbits tested. (The amount administered was not given.) A like amount of Cellulube 220 did not cause any deaths.

The inhalation of 10 milligrams of Fydraul 150 per cubic meter or approximately 2 tenths of a part of the Aroclor component per million for 24 hours a day for 30 days caused, statistically, definite liver damage. No matter how we discussed the situation, it was impossible to change their thinking that Fydraul 150 is just too toxic for use in a submarine. It may be that such concentrations would never be reached in the submarine but the Navy does not appear willing to even put the material in a trial run to see if it will work.

It would appear, therefore, that we should discontinue to sell Fydraul 150 for this particular application and try to develop a hydraulic fluid without Aroclor as one of its components. In this connection, Cellulube 220 is not used in a submarine but it was used in this test merely as a yardstick.

The Navy said they did not have any competitive fluid far enough along engineering-wise to even consider the toxicity of it.

R. Emmet Kelly, M.D.

REK:SHD

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EXHIBIT F

bcc: R. E. Keller - QUEENY

February 27, 1967

Dr. M. J. Thomas
Research Division
Building No. 33
National Cash Register
Dayton 9, Ohio

Dear Dr. Thomas:

Attached is a photostat of the original paper of Dr. Jensen in Sweden, relating to polychlorinated biphenyls. I will be happy to have your ideas after you read it.

As far as the section on toxicology is concerned, it is true that chloracne and liver trouble can result from large doses. Whether or not this is at all relevant to small quantities existing in human fat is, of course, an entirely different question.

At any rate, I believe before we worry about the toxicological part of the problem, we should settle the analytical part.

Sincerely,

R. Emmet Kelly, M. D.
Medical Director

REK/ln
att.

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Mr Chairman, Ladies and gentlemen.
In honor to our Brittish guest I will try to hold this lecture in English.

As the title of this lecture states, I am today going to tell about the discovery of some hitherto unobserved chlorinated hydrocarbons having up to eight chlorine in the molecule and found in residue analysis. The chemical name of polychlorinated bifenyls (In the following called PCB). To get familiar with PCB I will start with the chemistry and toxicologi.

Chemistry

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The main characteristic of PCB is 1. Their very high stability. As an example they can be boiled with nitrin acid without being destroyed. 2. They are hardly metabolised in living organism. 3. if more than 4 chlorine are present they are non inflamable. It is clear that these three characteristics does it easy to understand that when they have entered the living organism the will have a low persistence . But it is difficult to explain how they find their way into the living organism. One thing seems to be clear, they don't come from agricultural use, but from a technical one and most probable it comes to the nature via wastes that are tried to be burnt up, because then we have them at once in the air, because of their non inflamability.

Toxicologi

The PCB were introduced in 1929 and as early as 1936 Jones and Aldon reported that 23 out of 24 men employed in manufacturing of PCB suffered from an acne form eruption of the skin. Acne did not appear until 6 to 8 months after the material was first used. In 1937 Drinker reported that rats exposed to chlorinated biphenyls in concentration of approximately 1 mg/m^3 for 16 hours a day for 6 weeks showed damage of the livor. After that time the allowed concentration of PCB in air is 0,5 mg/m^3. (For DDt the same value is 0.5 - 1 mg/m^3). The same authors finished their experiments in 1938, and related that these compounds have an injourious effect, manifested solely in the liver. Chlorinated bipohnyls appeared to be the most injourious chlorinated compounds of all tested.

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Greenburg, Mayer and Smith 1939 reported that PCB and polychlorinated naphtalenes are blamed for the death of three young workers, and that pregnant women and persons who have at any time had any liver diseases are particularly suspectible.

Wedel, Haller and Benton gave 1942 animals PCB including administration by inhalation, ingestion and skin absorbtion. Histological examination of the viscera showed important toxic effect only in the skin and liver, and the degeneration effects in the liver are essentially the same whatever was the method for the administration. Faribok (1955/ found as an occupational poison in the electrical industry, mixed tetra and penta chlorobiphenyl causes folliculitis, comedo, pyodermia and other skin affections, and that its principal toxic effect is fatty degeneration of the liver.

Miller (1944) injected 69 mg PCB (4 and 5 chlorine) subcontaneously in 32 guinea pigs. Eight to ten days after injection, fat droplets were noted in the liver cells, and after 16 days they were present in moderate or very large numbers. Rabbits and rats were also tested in this investigation, as well as the PCB was administated both continously, subcuntinously or ingested in the food. In the feeding experiment 8 guinea pigs received 2 doses of 69 mg of the chlorinated biphenyl 1 week apart. Death occurred in 11 to 29 days.

Finally Mc Laughlin 1964 reported a method to test the chemical toxicity and teratogenic effect by injection into the yolk sac of fertile eggs prior to incubation. PCB was found between the eight compounds among 100 tested having the highest order of toxicity. No hatch was found at a level of 25 mg pr egg. At a level of 10 mg per egg, one chick hatched out of 20 injected eggs, but died 2 days later. Some embryos which were examined after they died, showed weak deformities (often a short upper brak) and growth retardation. Lead acetate resulted as an example in no hatch at a level of 1 mg per egg. Autopsy of the dead embyos have showed exten sive brain damage. Mercuric chloride showed no hatch even at a level of 0,5 mg per egg.

As the analytical chemistry is a pronounced service science I have been in contact with many scientists from other fields during the work with residue analysis, and I have always found this contact very stimulating for my own work. This co-operation often demands that we are talking the same scientific language. Because of this need I will today try to give a lecture in low level analytical chemistry for biologists, illustrated by the residue analysis of polychlorinated biphenyls.

The lecture will be divided in the following three sub-divisions:

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1. Chemistry of PCB and their toxicology.
2. Analytical methods for residue analysis and proof of structures.
3. Behaviour of PCB in nature, differencies in metabolising rate of the PCB components, potensation in an ecological serie, concentration levels and examples of samples which have been proved to contain PCB.

A residue analysis can be divided in:

1. Extraction of the pesticides from the biological material, followed by a careful cleaning-up to take away interferring substances, most often fats.
2. Identification analysis by mean of gas chromatography. Thin-layer chromatography and mass spectrometry.
3. Quantitative analysis.

At an ecological laboratory in Riksmuséet in Stockholm 1-2 g of a sample is cut out of the biological material and transferred into a weighed and carefully cleaned test tube, and stored at -20° until analysis. Smaller samples have been used, min. 5 mg of body fat, and with dry materials such as hair, feathers, pine needles 100 mg are sufficient to reach the desired 10 ng/g level in residue analysis. In cases of water proofs 1 l. is used for reaching the 10 pg/g. level.

B.1(homog) In order to facilitate complete extraction of the fatty materials from the biological sample, the doulbe amount of finely powdered anhydrous magnesium sulphate is added to the sampling tube, and the whole is homogenised with an insertable homogenizer. The resulting powder is transferred into a special Soxhlet extractor. After 4 hours of extraction the solvent is evaporated, leaving the fat in a small weighed test tube at the bottom Sox.-tube) of the extractor. This fat is dissolved in methylene chloride in such a way that 100 ul (0,1 ml) contain 20 mg of fat.

The 100 ul solution is now transferred to a little object glass, 3 x 7 cm, covered with a silicagel layer 1 mm thick, in order to form a line 0,7 cm from one end of the slide. Inserting this thin-layer plate into a vessel the bottom of which is covered by a few mm of methylene chloride, the solvent will be sucked up in the dry layer of silicagel, and at least reach the upper end of the plate. The fact is that the fat has a greater affinity to the powder on the plate than the chlorinated hydrocarbons have. — and we get a separation. The fat being more polar than the chlorinated hydrocarbons will never go longer than 2 cm before the

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solvent reaches the upper part of the glass.

7 ELUTION tube The front of the fat appears quite visible against a lamp, and with the aid of a razor blade the zone above the fat is transferred to the elution tube and the chlorinated biocides absorbed on the powder can now be eluted by one ml of ether. The concentration is sufficient for detection of the chlorinated hydrocarbons down to the 10^{-12} g level.

5 go The next step in the analytical procedure concerns the separation of the different chlorinated hydrocarbons that the sample may contain. As a matter of fact, this is a troublesome task. It is easy to estimate what is not present, but more difficult to say exactly one is present. We suffer from the negative demonstration, as will be shown later.

At first a few words about the separation of the components present in the sample and their visualization.

6 ge The separation is accomplished by mean of a gas chromatograph fitted to a detector that transfers its impulse to a recorder.

The system is shortly described:

A spirally formed glass tube with an inner diameter of 2 mm and about 2 m in length is filled up by a support, covered with an thin layer of an oil. The tube is heated in the chromatograph to about 200°. Through the tube a stream of nitrogen continously follows. When about 10 ul (1/100 of 1 ml) of the purified sample is injected into the tube, the components of the sample will be evaporized and go forward through the column with the gas stream. As the constituents have different affinity to the column filling they will pass the column with different speed and it will take different time for them to reach the detector at the other end of the glass tube. If the temperature and the nitrogen flow are held constant this time, the retention time, has a specificvalue for a certain compound. This is true, but unfortunately it is also a fact that two components can have the same retention time. This is one of the bigger problems in gas chromatographic analysis of unknown samples, as will soon be obvious.

To make it possible to estimate the retention time it is necessary to visualize the chlorinated hydrocarbons. For that purpose more or less specific detectors are used. The detector most often used in posticide analysis is the so called electron capture detector, which can detect down to one picogram (= 10^{-12} g of lindan). Unfortunately this detector is not specific for chlorine, bu gives answer also for oxygencontaining compounds. The response here is much lower but can be counterbalanced if the consentration of the oxygen containing is much higher. 0281423

The principle for the electron capture detector is shortly:

At the end of the gas chromatographic tube is placed a little tube containing a foil made of titanium tritide. This is an radiant. The p-

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particles are reacting with the nitrogen molecules coming from the column. Then we get + N_2 -- e^- + N_2^+. Over the detector we have a tension of 90 volt and by mean of the electrons we will get a constant electrical current over the detector. This standing current is transferred to a one-mV recorder as a constant baseline. When now a chlorinated hydrocarbon leaves the column this compound has a high affinity to the electrons and this means that the amount of electrons will diminish, and they will diminish proportionally to the amount of chlorine. The electrical current will also diminish and this is noted as a peak on the recorder. The area of the peak will be proportional to the amount of substance in the sample. By mean of a standard injection it is now possible to compare the retention time and the area of an unknown component with the retention time and area of the known standard. As said before this detector is not specific for chlrine but anyhow very useful, because of its high sensitivity. The system described has, as we have seen, two disadvantages:

1. Two different compounds can have the same retention time and be detected as one peak.

2. A registrated peak does not need to be chlorinated , because the detector is not specific.

If the sample is injected in two different columns with different chemical properties we have increased the chance for a good separation. If two compounds have the same retention time on one column they may not have it on another. When a result seems doubtful, - if the compound being responsible for a certain peak contains chlorine or not - it is possible to concentrate the sample and analyse it on a less sensitive detector such as the microcloumetric one, which is specific for chlorine. The compound is burned in a furnace and teh generated chlorine titrated directly.

As is seen from the two last mentioned possibilities it is anyhow possible to get a rather high degree of certainty in residue analysis, but it is a rather time-consumeing work.When using this method just described, we very often found that many chromatograms from residue analysis of most carefully purified samples still contain a large number of peaks. Many of these have retention times that do not agree with any known chlorinated pesticides, or their metabolites. This chromatogram con serve as an example. It was obtained by residue analysis of a sea-eagle found dead in the archipelago of Stockholm. In the range of the known peaks, there are so many unidentified that there also must be an obvious risk of the known peaks to be covered by unknown ones.

If this remark is found true, the reported results of many previous quan-

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titative analysis must be brought into question. In the present investigation it is shown that most of the unknown peak of chromatograms at residue analysis of chlorinated pesticides are due to polychlorinated biphenyls.

I will show a chromatogram of human fat analysed on a so called SF 96 column, the most often used type in pesticide analyses. Early retention times were in agreement with DDE, DDTop and DDTpp. Next slide shows the same sample analysed on a QF-1 column. Now the former 2 DDT peaks have divided into 4 peaks, and two of them are still in agreement with DDTpp and op., the two new were unknown.

Logically, these unknown components were at first thought to be metabolites of the insecticides. Against that spoke that neigther treatment nor concentrated sulfuric acid in other. This treatment made it rather sure that the compounds did not contain oxygen. In Sweden residues of organic mercury have been investigated rather intensively in the Swedish fauna. As these compounds give very high responses to the electron capture detector it was also investigated if the unknown peaks could have a mercuric origin.

It was found that the water-ecological series had high residues of both mercury (Westermark, Johnels) and the unknown ones, when the same individuals were analysed. Anyhow, the pheasant suffering most from mercury poisoning only contained low levels of electron capturing compounds and these belonged to the normal insectisides. Therefore the unknown could hardly be mercurials or metabolites of them.

As the eagle sample giving the chromatogram shown in fig. 10. could be estimated to contain DDT and DDE up to 13 g/kg in extractable fat, the amount of unknown compounds also were suggested to be in the same range, and tehn sufficiently high to do a run on the combined gas chromatograph – mass spectrometer. If this could be done successfully it would be possible to get very important informations about the chemical nature of the unknown, for ex. the molekular weight numbers of chlorine etc. This method is up to now the method giving the highest degree of certainty in the low level analytical chemistry, amounts of 100 ng substance being enough.

As this method for identification of totally unknown residues surely will be very important in the future (when f.ex. a biologist has found that fishes in a river die) it may be possible by mean of this method to find out exactly what compounds are responsible for the death. For this reason, I will go into some details with this method. In the actual case we took the extract from 20 mg eagle and concentrated

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it as much as possible and made an injection on the gas chromatograph combined with the mass spectrometer. The result was the chromatogram shown on the next slide. Every time the recorder showed that a compound is leaving the column, the effluent is led to the mass spectrometer. Now just a few words about the mass spec.

The molecules leaving the column are bomded with electrons at E. We have now got the molecule positive charged, but with the same mass as before. This M^+ is accelerated in a vacuum and will then get a kinetic energi.
where is the speed. Next comes the magnetic field that tries to bend the direction of the molecule. This will be big for a small molecule and less for

If we have a sieve in the other end we can directly read the molecular weight. Added to this parent molecule M^+ we will also get addition informations, because of the fact that M^+ may not be stbble, a part of them will be broken down before they reach the sieve in the other end.

F.ex. M^+_{DDT} $M^+_{DDT} - CCl_3$

Mass spectrograms from the different unknown peaks in the eagle sample as shown. The mass numbers equal to the molecular weights of the unknowns could be read to 426,392, 358, 324. Astonishingly, the molecular differences were constantly 34 mass units. This difference shows a familarity in origin of the unknown. Now the fact is that chlorine exists as a mixture of two isotopes with atom weights 35 and 37 in proportion 75:25. If the molecule has one chlorine, this will give two molecule peaks, one for Cl_{35} and one for Cl_{37}. If there are two chlorine we have the possibility of one with only Cl_{35}, one with both Cl_{35} and 37 and one with 2 Cl_{37} and therefore

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The relation of the peaks found on the different mass spec were:

Molecular weight	324	358	392	426
Chlorine content	5	6	7	8

An explanation of the familiarity of the compounds can be given if one substance is built from the former by substituting a hydrogen with chlorine

$RH \quad + Cl_2 \qquad RCl + HCl$

$M^+ \qquad M^+ + 34$

Then it is possibl to calculate the molecular weight of the parent hydrocarbon PHC.

$M_{PHC} = M - x\,M_{Cl} + x\,M_H$, where M is the molecular weight of the component having x chlorine atoms. F.ex. for m = 426 and 8 Cl we will get M_{PHC} = 426 - 280 + 8 = 154 and equal with the other molekyls.

The most probable formula with carbon and hydrogen giving this molecular weight is $C_{12}H_{10}$ and this can only be satisfied when the parent-hydrocarbon is biphenyl, and the unknown being polychlorinated biphenyls. This explanation was later fully verified by injection of a synthetic PBC on the mass spec.

Furthermore extensive gas chromatographic investigations proved that the PBC standard gave peaks with the same retention time as the unknown peaks from the sea eagle.

With the method just described I suppose that we have a new possibility to study the residues in the air because the pine needles can allways be . We have had great difficult: in quantifying the PCB, but when getting a little more time it will be possible. We have done a few calculations on a few species, and I suppose they are right within a factor 2. We have found the residue to be from

It has been my statement here to-day to present this method for studies of defiling of the nature, and with this method a new type of defiling agents has been found to be present in nature, and a few experiment have shown where they may be found.

Now this method is going to be used in the first hadn to estimate how the situation is in nature as a whole, and in the other hand to find the leaks throug which they find its way to nature. Some maybe are present here today to get news about the leaks, and to them I want to say come back in a year.

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So much I think I can say again that the PCB hardly can come from agriculture. As support for this suggestion I can say that we have found PCB in eagle feathers from Riksmuseet from 1944, where hardly any chlorinated pesticides were used in agricultrue. One more thing that I find important to say is that in contrast to the meroury problem this does not seem to be a pure Swedish problem. I have just studied chromatograms taken from London air, and they clearly contain PCB, and dr. Holden has told me that he also find them in his fishsamples. But finally in waiting at more results Ishould like to point out one morething. It is proved that PCB comes to nature, we dont know now where they are used, but they are very persistant to chemicals and to fire. I think the poison jury should try to state that a content of PCB shall always be found in an open declaration.

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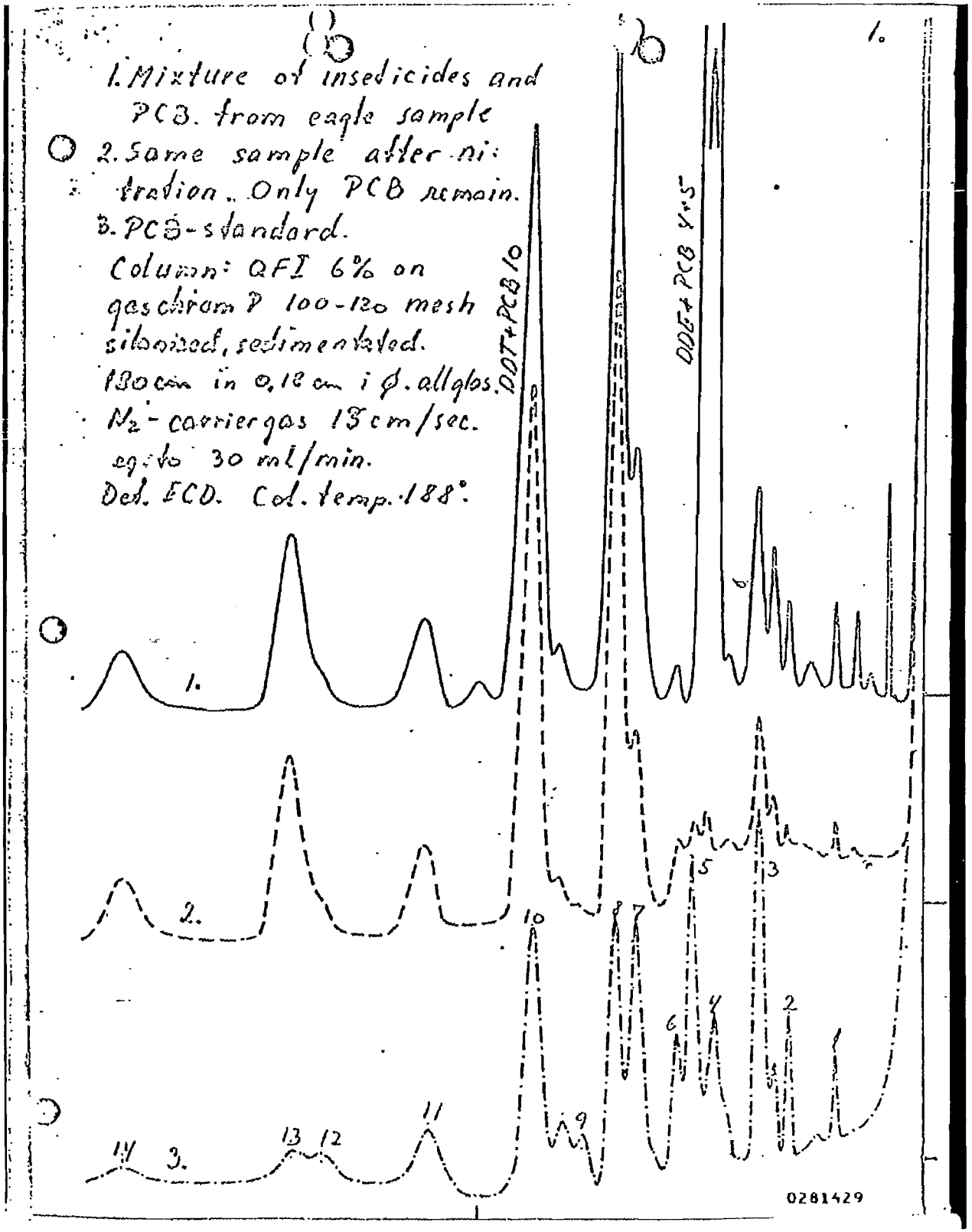

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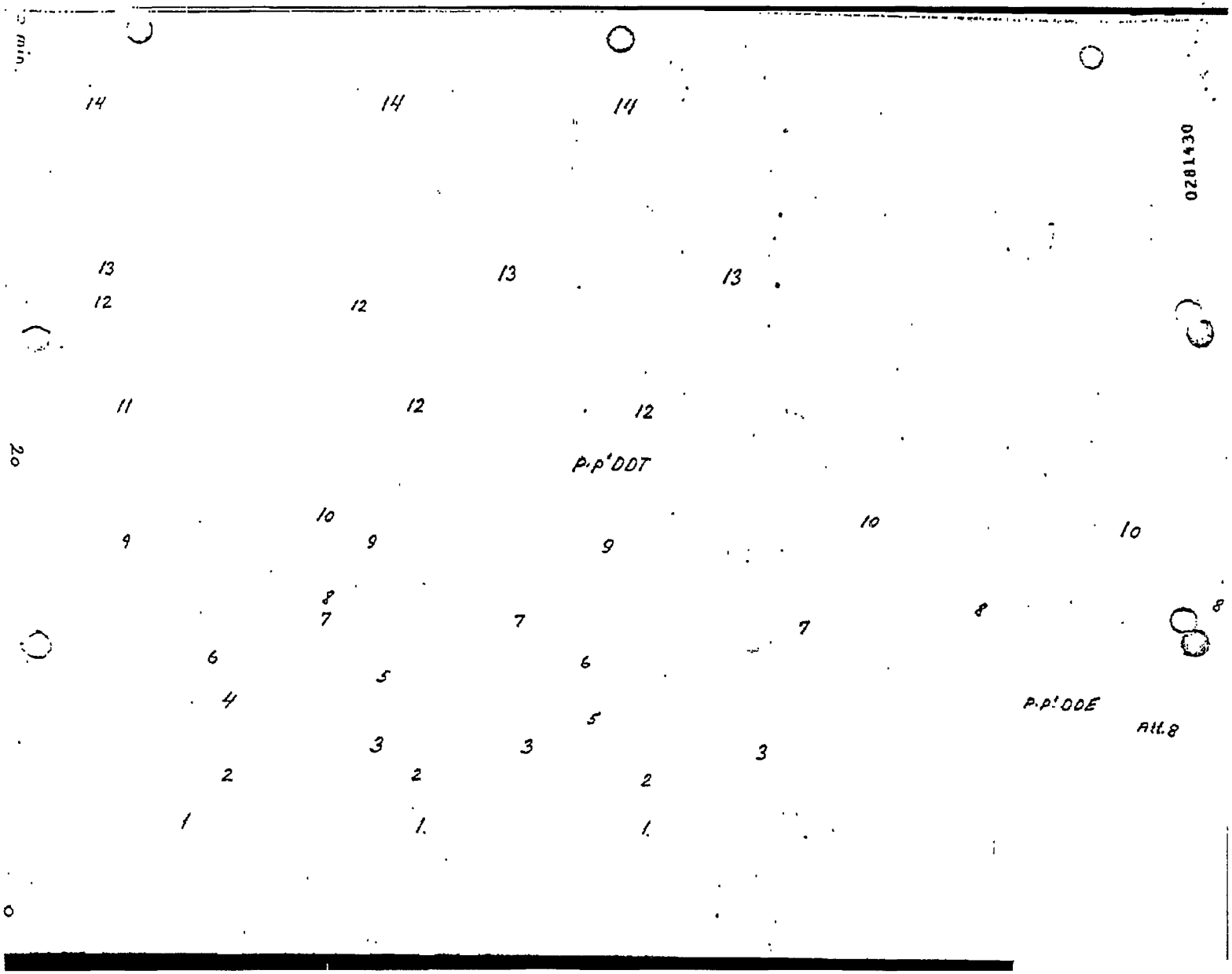

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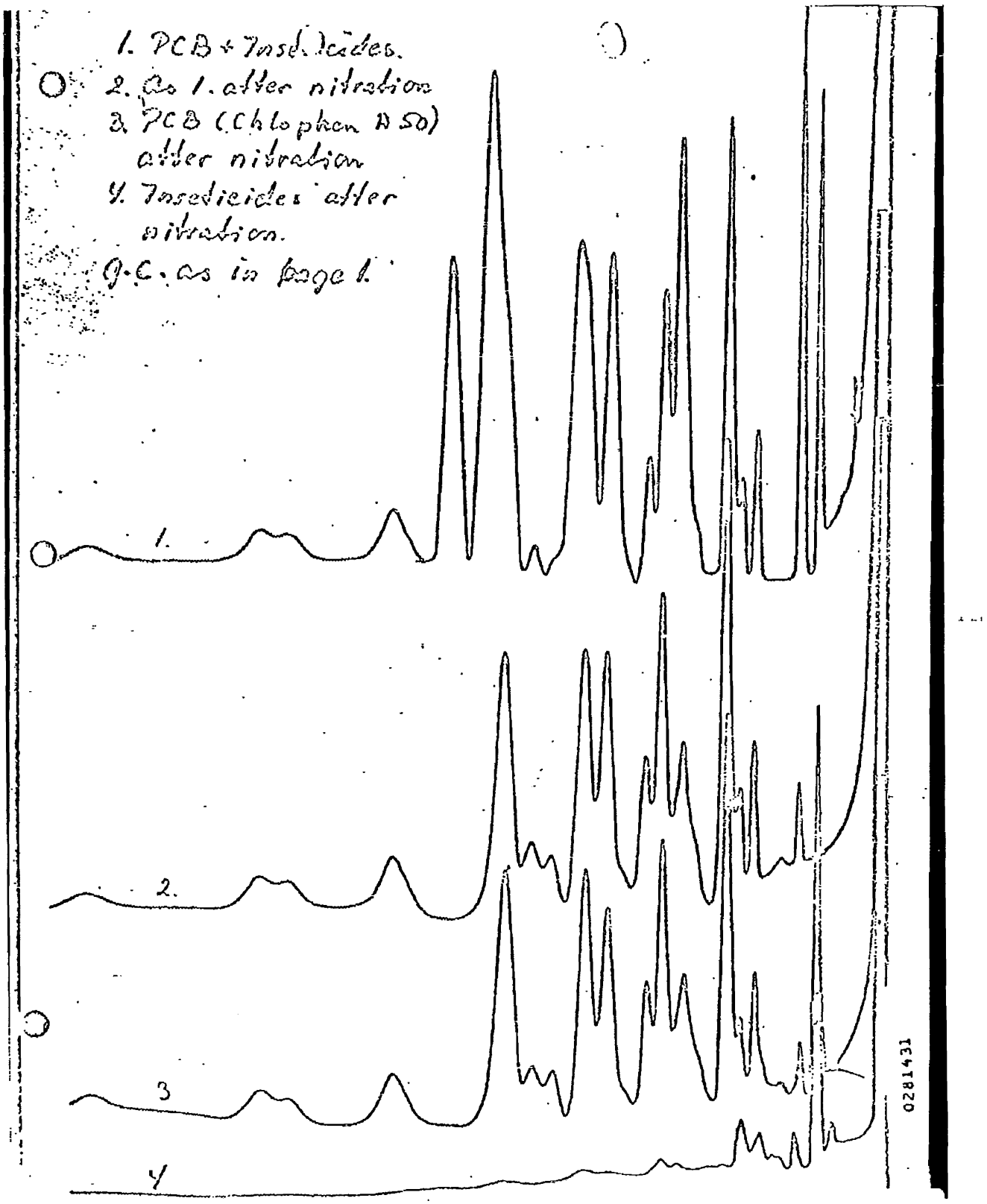

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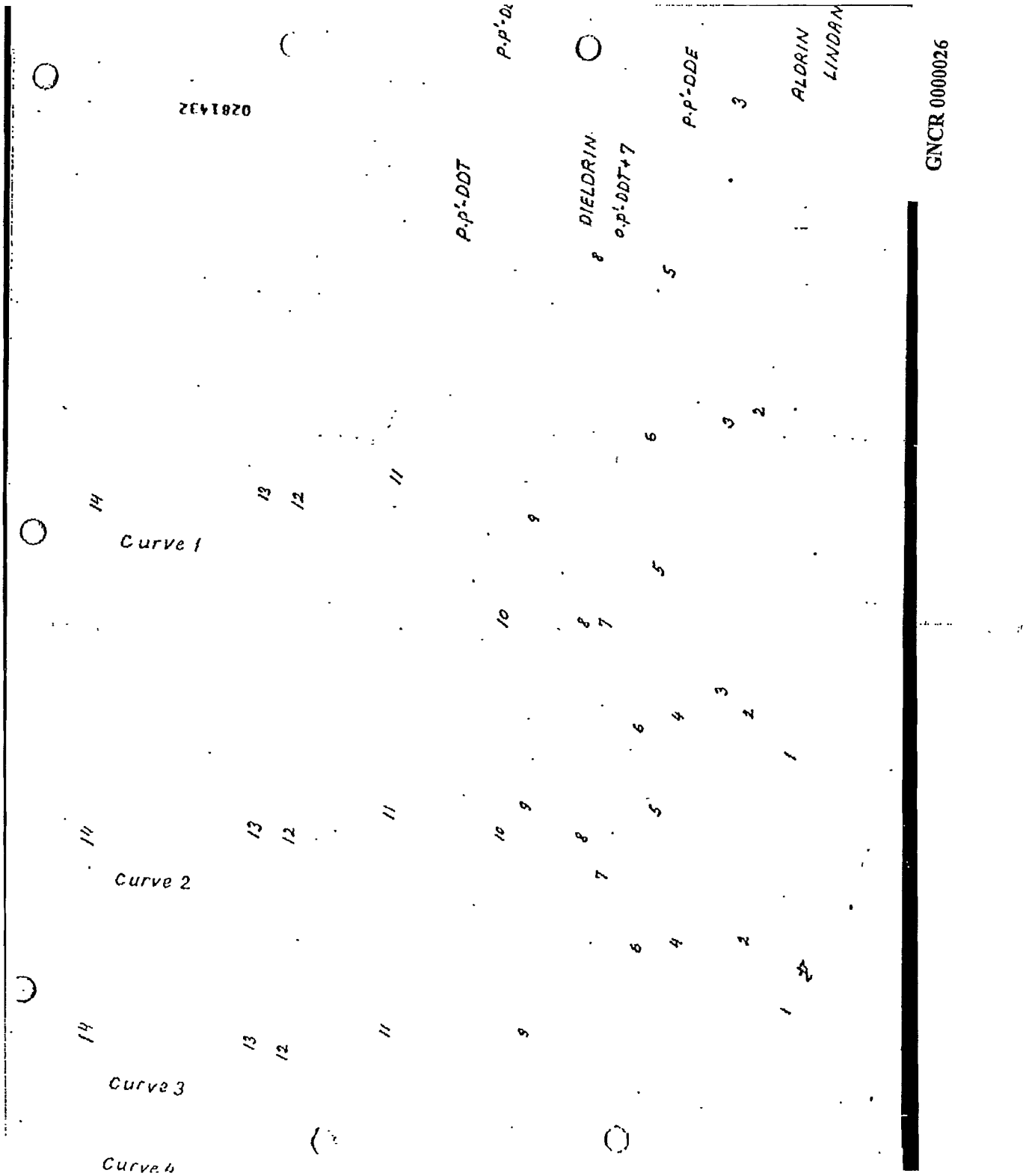
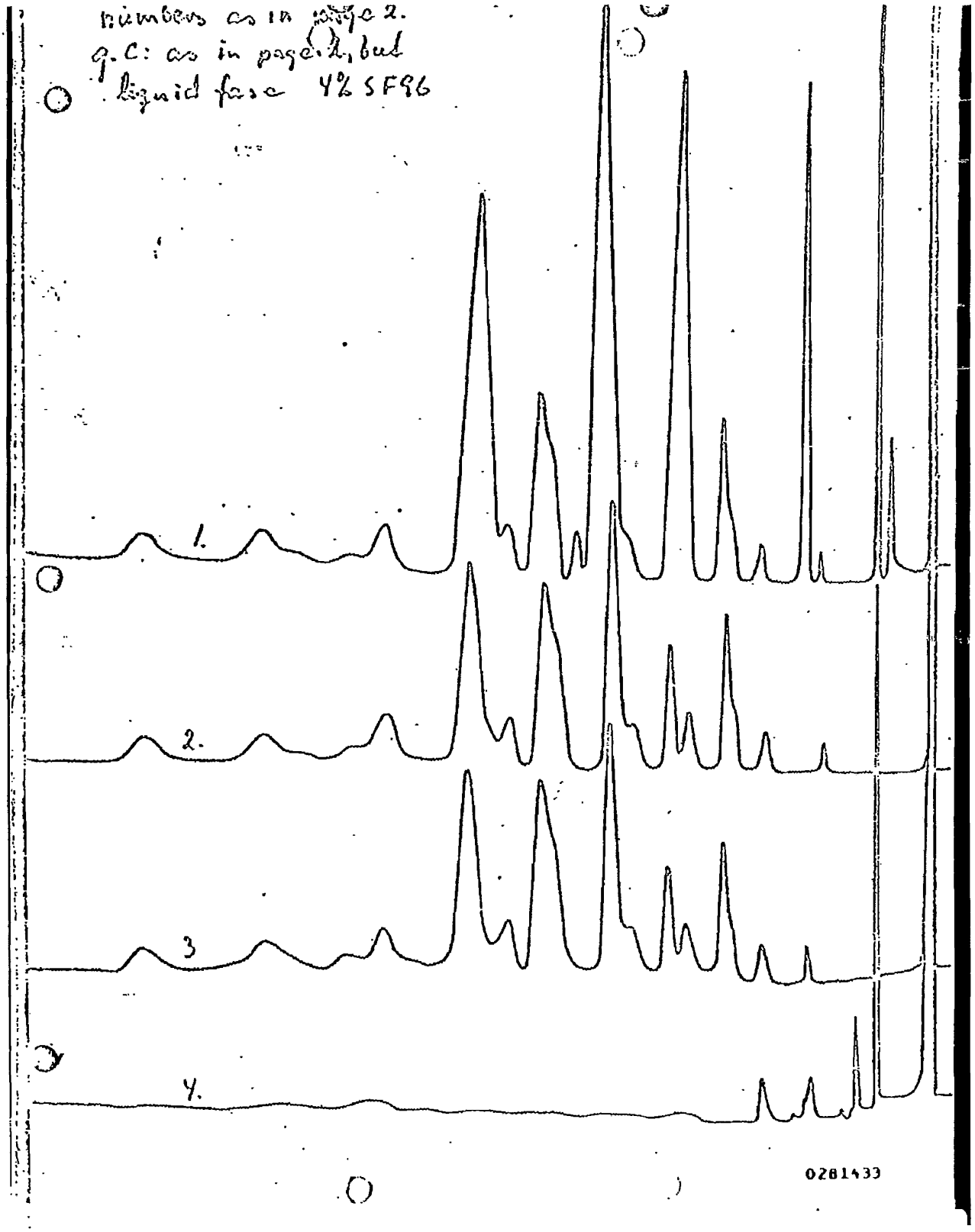

0281432
P.p'-DDT
DIELDRIN
o.p'-DDT+7
P.p'-DDE
3
ALDRIN
LINDAN
GNCR 0000026
Curve 1
Curve 2
Curve 3
Curve 4



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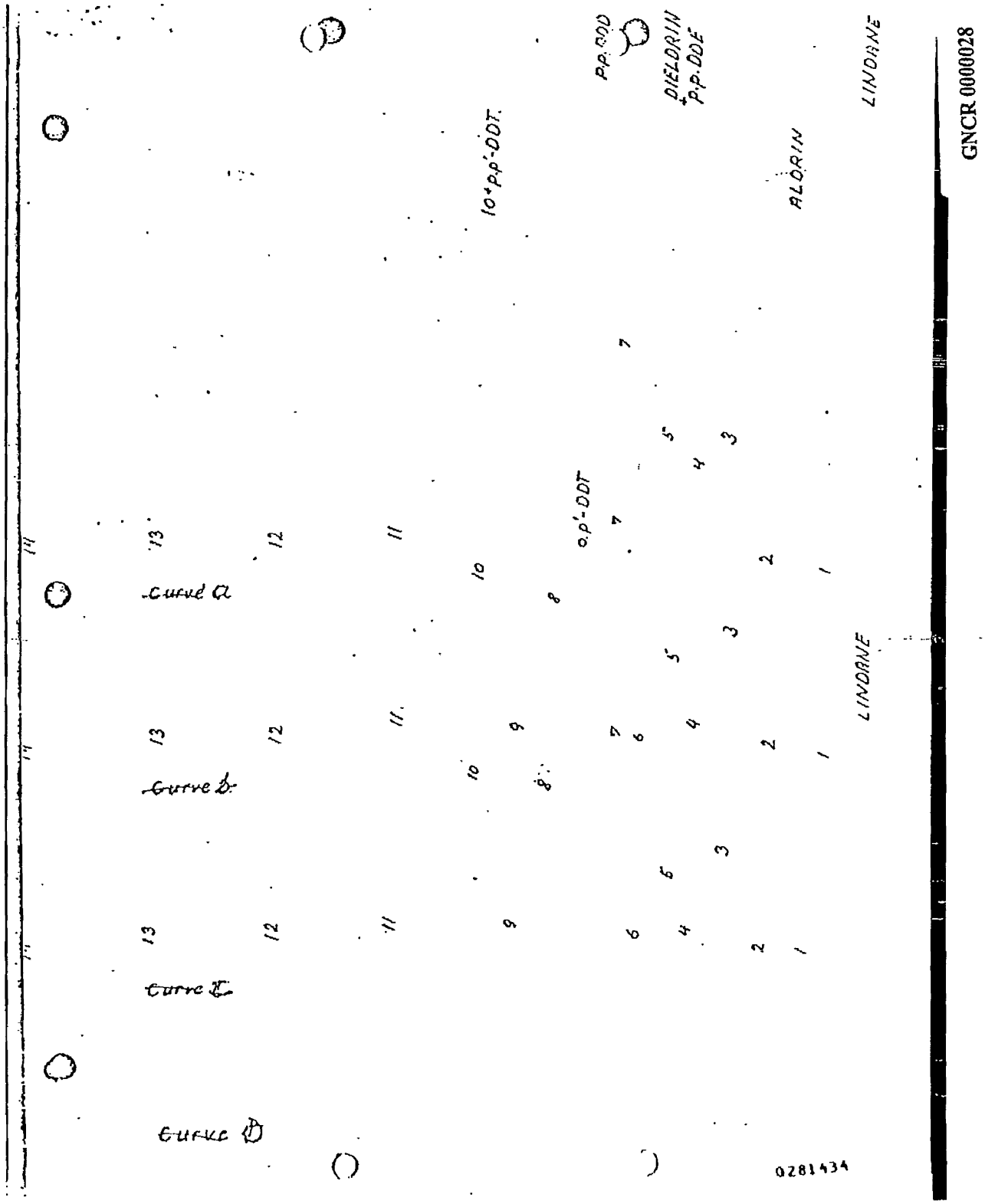
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LINDANE
ALDRIN
DIELDRIN
P,P-DDE
P,P-DDD
10+P,P'-DDT
O,P'-DDT
LINDANE
Curve A
Curve B
Curve C
Curve D
0281434

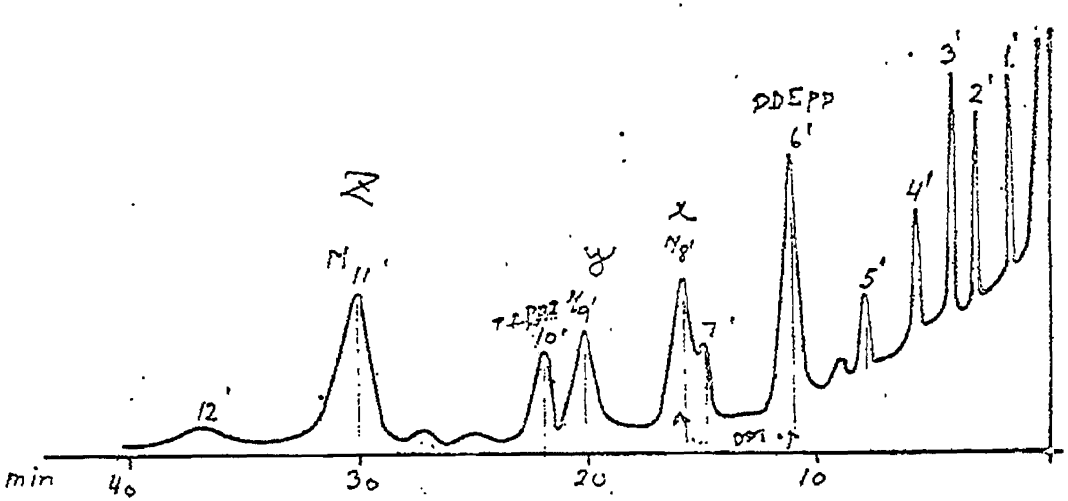

Fig 3. GC-MS chromatogram from eagle sample. Peak numbers represent time points of scanning.

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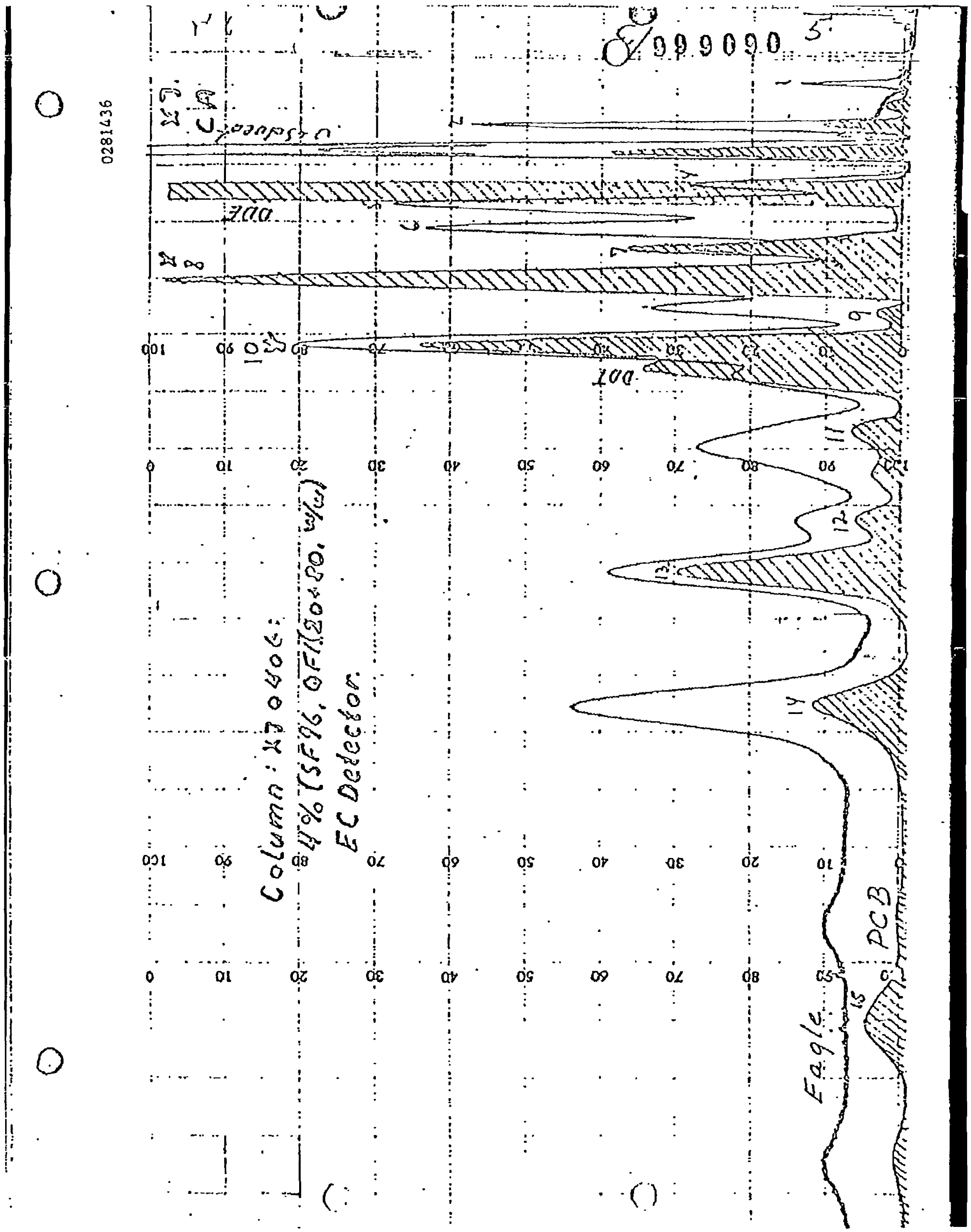

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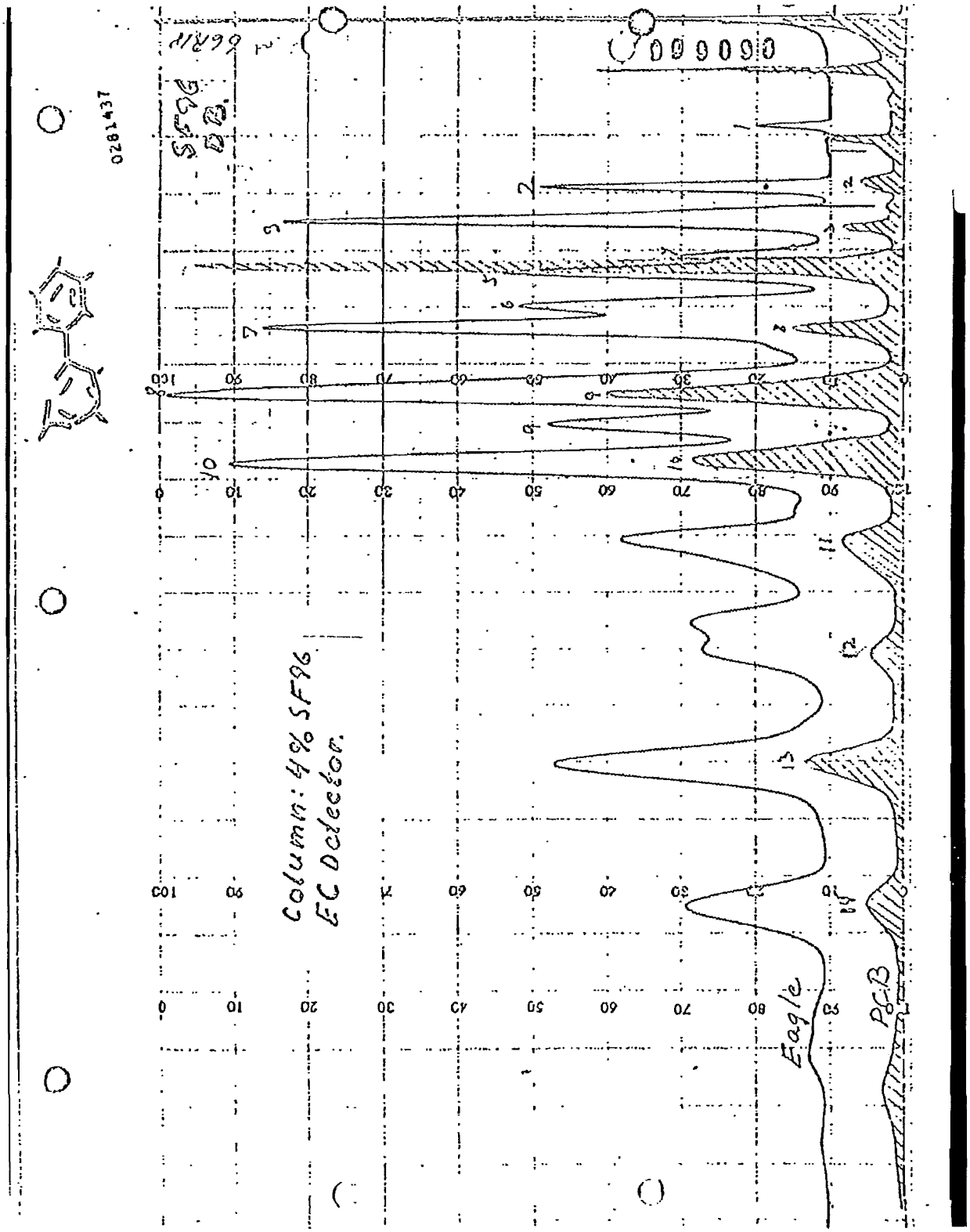
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0281437
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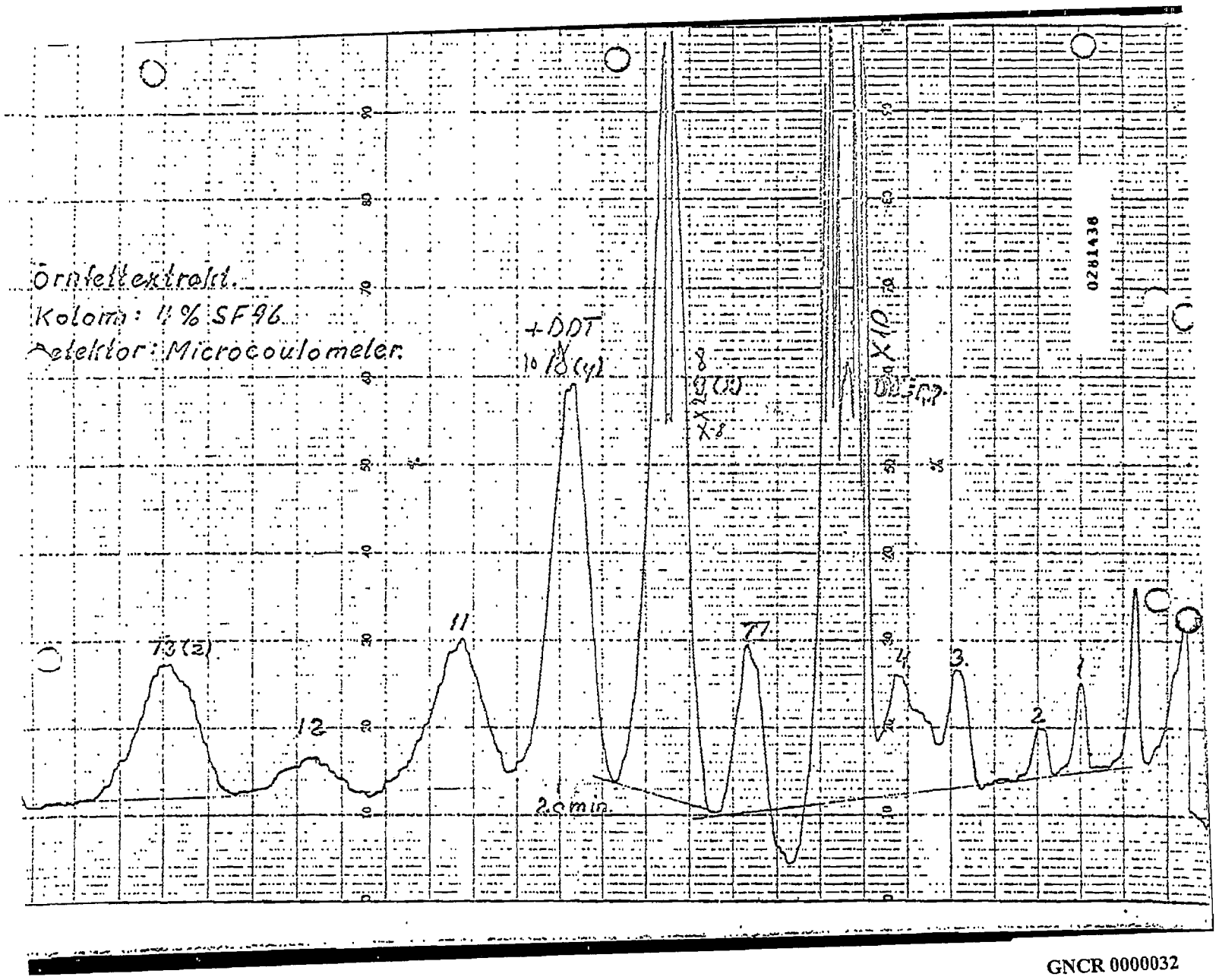
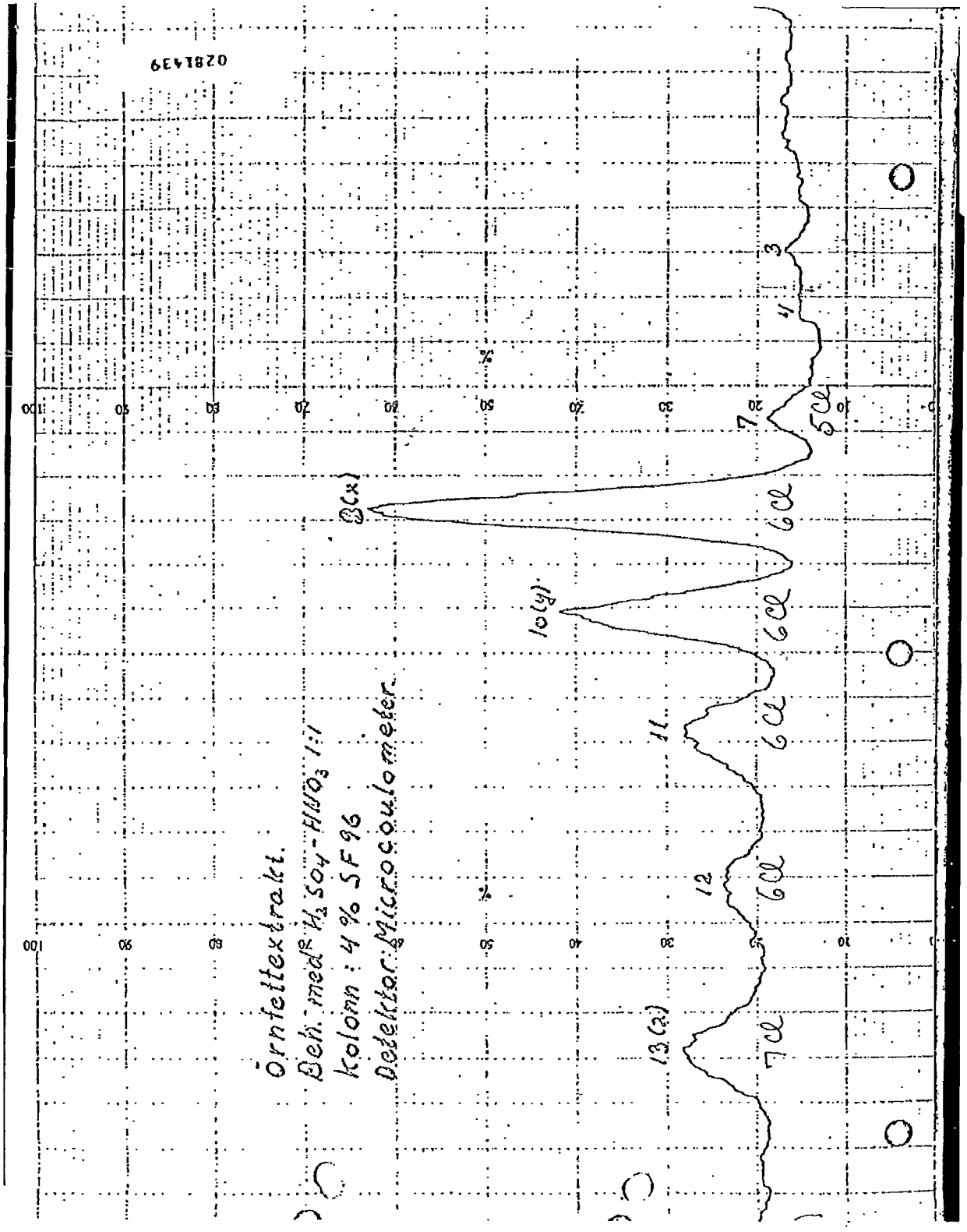
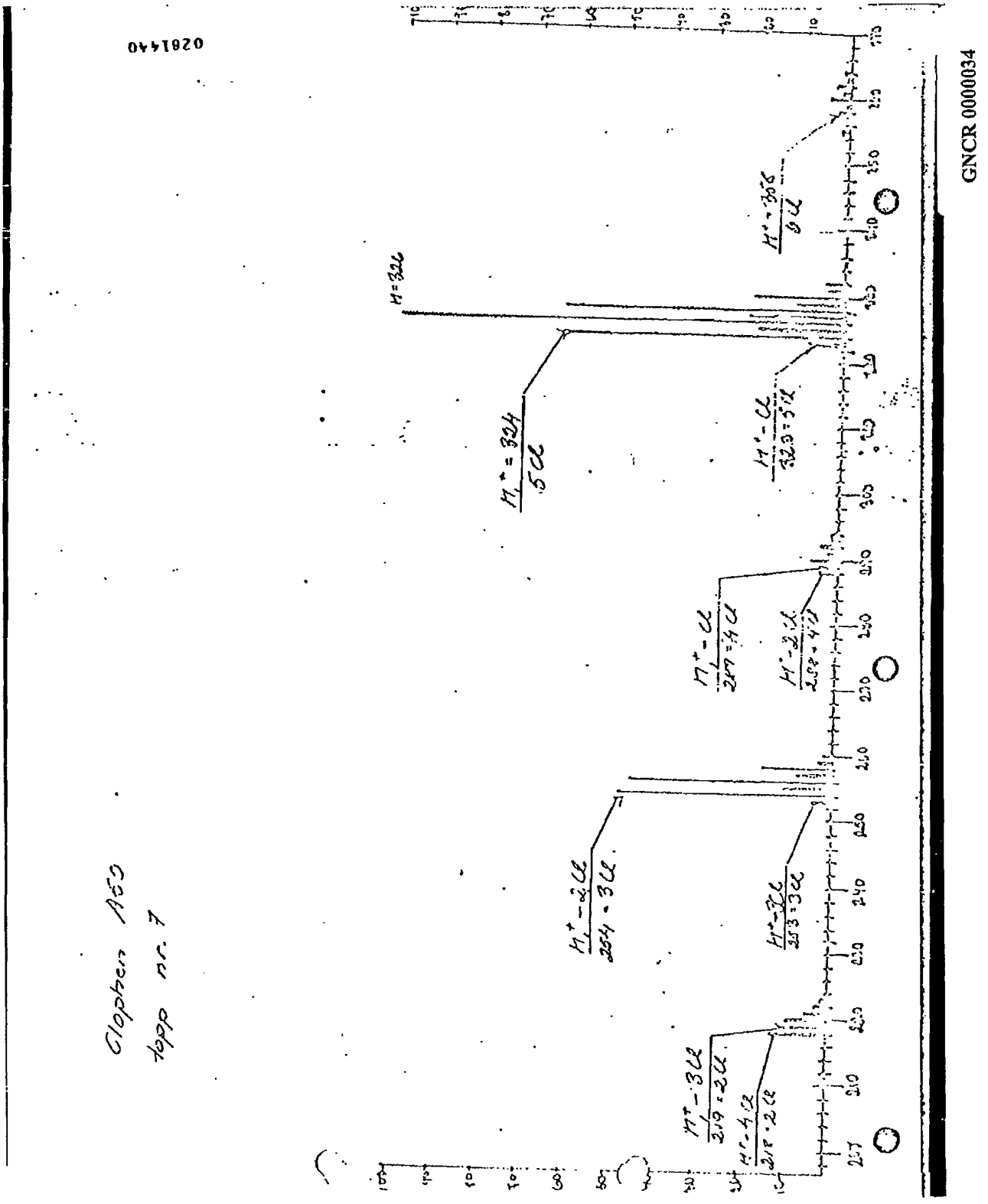
EC Detector
Eagle
PC-3




0281439
Örnteltextrakt.
Deh. med H_2SO_4-HNO_3 1:1
Kolonn: 4 % SF 96
Detektor: Microcoulometer.
B(x)
10(y)
11.
12
13(z)
GNCR 0000033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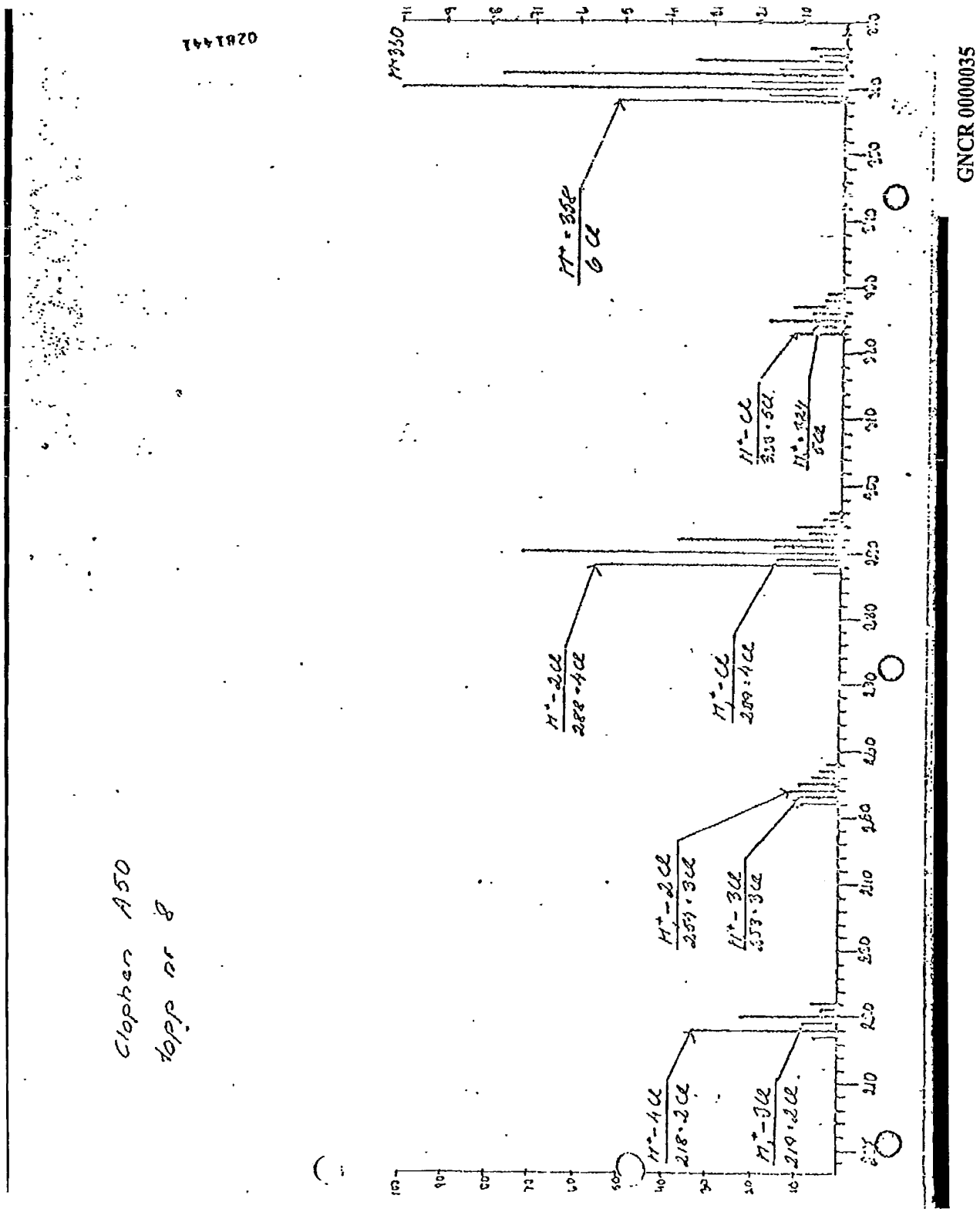
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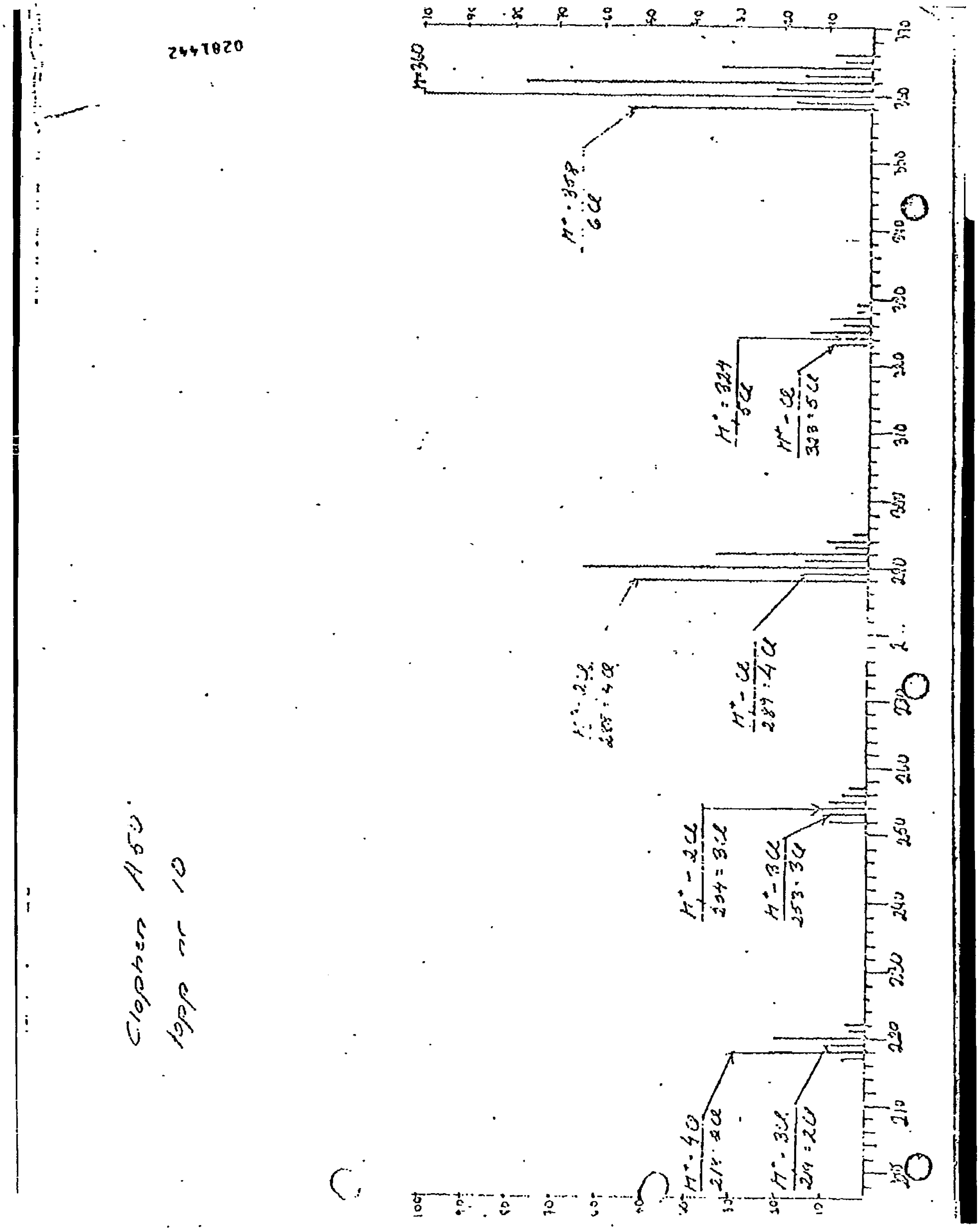

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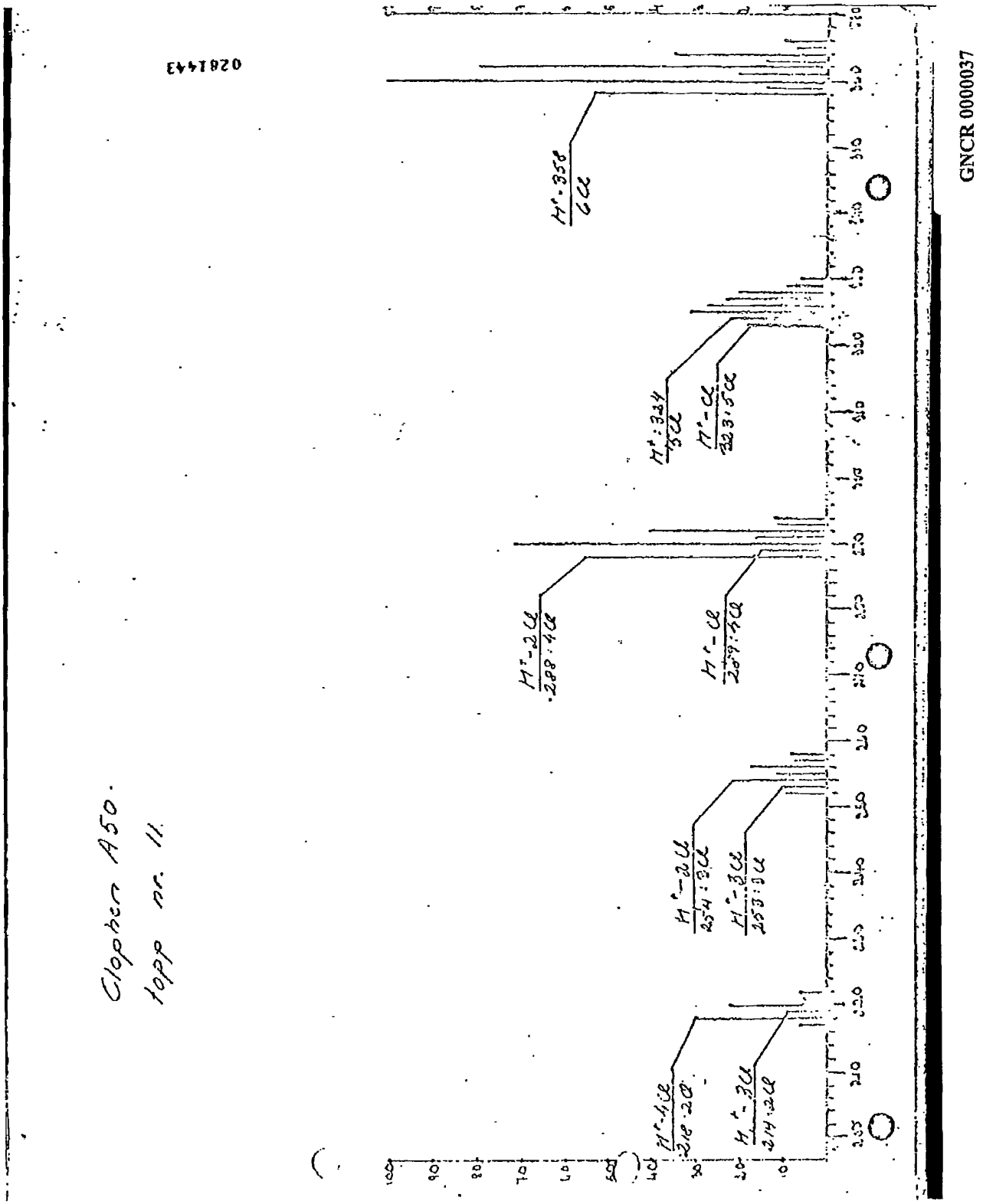
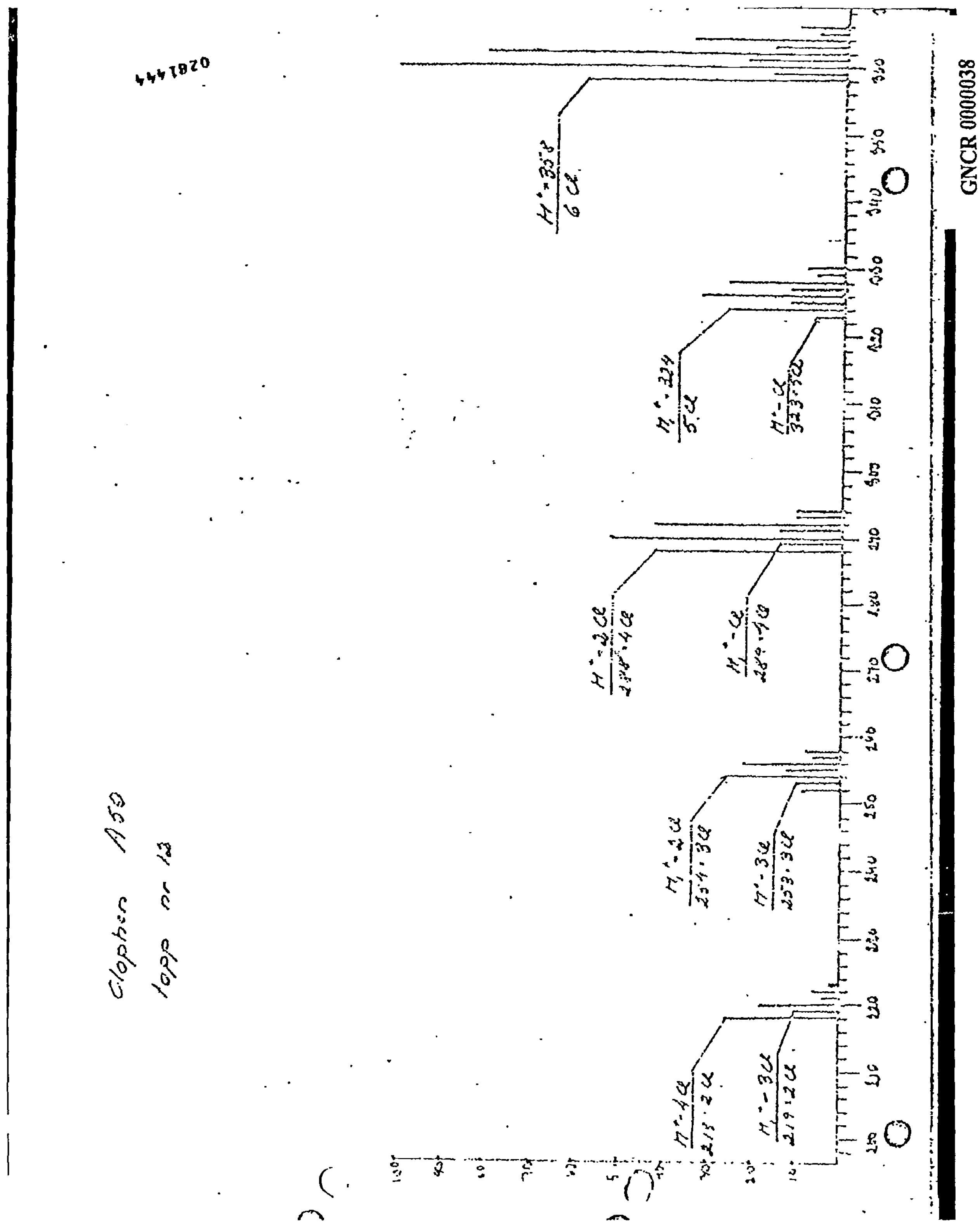

0281443
Clopbern 1950.
topp nr. 11.
GNCR 0000037



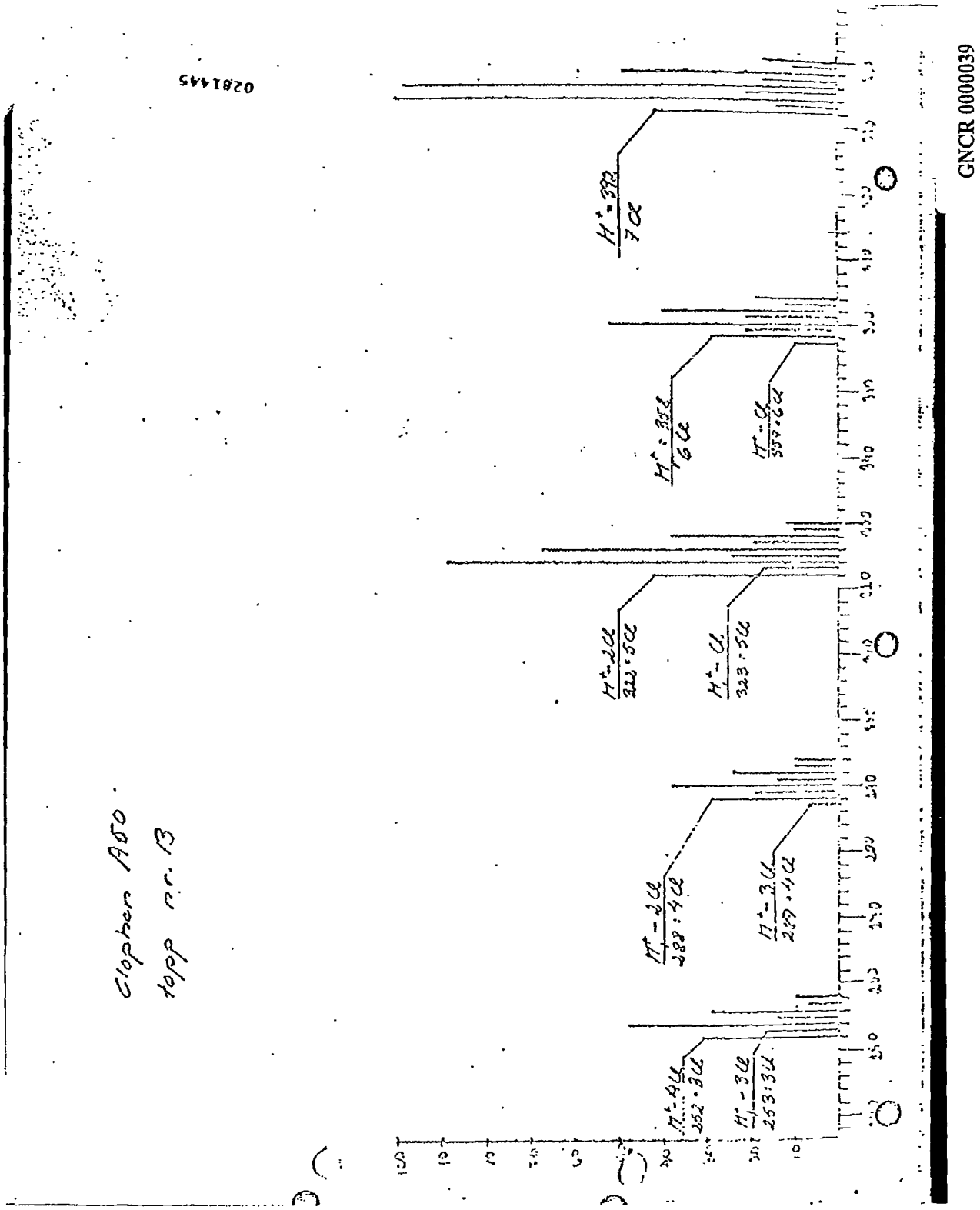

0281445
Clapham 1950
topp nr. 13
GNCR 0000039

EXHIBIT G

NEW SCIENTIST Dec. 15, 1966

"Report of a New Chemical Hazard"

A Swedish research worker has expressed concern over the increased amounts of polychlorinated biphenyl (PCB) entering the air, presumably from industrial smoke and rubbish-dump smoke, and being absorbed by water and taken up by fish and later humans. PCB which is related to and as poisonous as DDT was detected by Mr. Sören Jensen of the Institute for Analytical Chemistry, University of Stockholm, in some 200 pike taken from different parts of Sweden, fish and fish-spawn throughout the country, an eagle which was found dead in the Stockholm Archipelago, and in his own, his wife's and baby daughter's hair. As the baby is only five months old her father concludes that she got her dose of PCB with her mother's milk.

It is not known at present how much of this substance is dangerous or even fatal. If it is comparable with DDT then the limit would be 0.5 mg per cubic metre of air--and, for comparison, the dead eagle had at least 10 times as high a concentration in its body. For purposes of elimination Mr. Jensen has obtained feathers from eagles preserved at the Swedish National Museum of Natural History since 1880 and has detected PCB first in an eagle from 1944.

In Sweden, PCB is known to be used in electrical insulations, hydraulic oils, high-temperature and high-pressure lubricating oils, paints, lacquers and varnishes, and as pigments in various plastics. It does not seem to be used as an insecticide. It is not destroyed by incineration and may enter the body directly through the skin, by breathing, or by way of food (especially fish). It is particularly harmful to the liver, and also the skin; this has been demonstrated by experiments on mice. PCB is much harder to break down than DDT and there is every reason to suppose that it is much more difficult to get it out of the system. The substance has also been detected in the air over London and Hamburg and also in seals caught off Scotland. It can therefore be presumed to be widespread throughout the world.

-oOo-

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EXHIBIT H

Polychlorinated Biphenyls in the Global Ecosystem

by
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Polychlorinated biphenyls are widely dispersed in the global ecosystem, and are powerful inducers of hepatic enzymes which degrade oestradiol. Together with other chlorinated biocides, such as DDT, they could account for a large part of the aberration in calcium metabolism which has been observed in many species of birds since the Second World War.

DECLINING populations of raptorial and fish-eating birds in Great Britain[1] and North America[2] have produced thin-shelled eggs since the period after the Second World War. A widespread change in the chemical environment which affected the calcium physiology of these species evidently occurred at that time. The chlorinated hydrocarbons, which came into general use in the 1940s, may now be the most abundant synthetic pollutants present in the global environment[3]. Thin eggshells have been found only in species which accumulate high concentrations of these compounds: relatively uncontaminated populations of these species continue to produce normal eggs[1,2].

Calcium metabolism in birds is intimately related to reproductive metabolism and is to a large extent regulated by steroids such as oestrogen and vitamin D[4]. The deposition of medullary bone, the chief source of calcium during egg and eggshell formation, is controlled by the steroid sex hormones[4–7], and hens deficient in vitamin D lay eggs with lower eggshell weights[8]. Steroids are hydroxylated and thereby degraded *in vivo* and *in vitro* by hepatic enzymes induced by exogenous, lipid-soluble substances, including the chlorinated hydrocarbons[9–14]. The relatively small amounts of chlorinated hydrocarbons required to produce this effect[9,11,15–18], and the discovery that small amounts of some of the DDT compounds are oestrogenic[9,19,20], have made irrelevant much of the parts per million approach to pollutant ecology based on toxicity data alone.

In both Great Britain[21–24] and North America[25] it was the decline of the peregrine falcon which initiated concern about the extent of the harmful effects of environmental contamination. In the United States the eastern population was extinct before competent observers were aware of a general, widespread decline[25]. Breeding peregrines persist in apparently normal numbers in British Columbia[26] and in the Arctic[27,28].

In 1967 we collected an unhatched, abandoned egg of a peregrine falcon in south-western North America, where a small remnant population remains (unpublished work of M. N. K., R. W. R. and S. G. H.). Analysis of this egg (Table 1) showed that it contained almost 5 mg of *p,p'*-DDE (dichloro-2,2-*bis*(*p*-chlorophenyl) ethylene). Unknown peaks present in the chromatograms of the extract of the egg were unidentified until polychlorinated biphenyls (PCB) were detected in European wildlife[29–31]. Positive confirmation of the identification was accomplished by mass spectrometry in Sweden[30]. The retention times of the unknown peaks in the peregrine extracts proved to be identical with those of several PCB compounds on *DC*-200 and *QF*-1 columns[3] and on a mixed *SE*-30:*QF*-1 column. Other species of birds and fish were subsequently analysed for PCB. The chlorine content of several extracts and standards was determined with a Dohrman microcoulometric detector and a method of quantification of the PCB compounds was devised based on peak heights produced in the electron capture detector related to standard *p,p'*-DDE[3]. The DDT compounds are destroyed by nitration[32] and *p,p'*-DDT (1,1,1-trichloro-2,2-*bis*(*p*-chlorophenyl)ethane), DDD (1,1-dichloro-2,2-*bis*(*p*-chlorophenyl)ethane) and toxaphene are dehydrochlorinated by saponification with alcoholic KOH. PCB is not degraded by either procedure.

Table 1. CHLORINATED HYDROCARBONS IN NORTH AMERICAN PEREGRINE FALCONS

Sample	Dieldrin	Total DDT*	Percentage DDE	PCB	DDT/PCB
1. Unhatched egg†					
Baja California (wet)	0·11	102	97	10·2	10
2. Second year‡ migrant from Arctic					
Breast muscle (wet)	NM	99	94	28	3·5
Breast muscle (dry)		296		84	
Brain (wet)	NM	85	98	21	4·7
Carcass (wet)	0·87	70	93	19·7	3·5
Carcass (lipid)	62·5	5,000		1,420	
3. Immature, California§					
Breast muscle (wet)	NM	14·4	90	9·4	1·5
Liver (wet)	NM	7·7	92	4·5	1·7
Brain (wet)	0·04	2·8	89	1·5	1·9
Brain (lipid)	0·50	36		19·3	
Carcass (wet)	0·11	20·2	92	10·8	1·9
Carcass (lipid)	1·6	300		160	
4. Adult, California‖					
Breast muscle (wet)	NM	127	87	98	1·3
Liver (wet)	NM	77	80	57	1·4
Brain (wet)	0·31	49·5	86	31·6	1·4
Brain (lipid)	3·7	595		415	
Carcass (wet)	1·7	85	87	65	1·3
Carcass (lipid)	50	2,600		1,980	
5. Immature¶ migrant from Arctic					
Breast muscle (wet)	NM	2·3	81	0·16	14
Breast muscle (dry)		7·8		0·54	
Liver (wet)	NM	1·0	92	0·10	10
Brain (wet)	NM	0·43	83	0·037	12
Body fat (wet)	NM	50·3	82	3·2	16
Carcass (wet)	0·07	9·3	82	0·80	12
Carcass (lipid)	0·44	63·7		5·5	
6. Immature Arctic migrant**					
Breast muscle (wet)	NM	1·9	89	0·6	3·4
Breast muscle (dry)		6·0		1·9	

Concentrations in parts per million wet weight, dry weight or lipid weight.

* DDT residues include: *p,p'*-DDT, *p,p'*-DDE, *p,p'*-DDD (*p,p'*-TDE), *p,p'*-DDMU, *o,p'*-DDT and *o,p'*-DDE. NM, Not measured.

† Chlorinated hydrocarbon contents of the egg were: 4,700 μg *p,p'*-DDE; 40 μg *o,p'*-DDE; 29 μg *p,p'*-DDT; 7·4 μg *p,p'*-DDD; 37 μg *p,p'*-DDMU; 5 μg dieldrin; 12 μg heptachlor epoxide. Concentrations were calculated by assuming a volume of 47·3 ml., the average value obtained by measuring eleven clutches of peregrine eggs from California in the Museum of Vertebrate Zoology, University of California, Berkeley, and by assuming a density of 1·0.

‡ Second year female, captured in October on the Texas coast during migration. Died in captivity shortly afterwards, no apparent cause of death. No body fat. Total body content of chlorinated hydrocarbons: 35 mg DDT, 10 mg PCB, 0·44 mg dieldrin, 0·18 mg heptachlor epoxide. Total body lipid, 7 g.

§ Plumage characteristics of both 3 and 4 were intermediate between those of typically resident California birds and the Arctic race *F.p. tundrius*, as described by White[33]. No. 3 was an immature female of the year trapped in the southern San Francisco Bay area in the winter of 1966. Observed feeding in the area for a week before capture. Died suddenly after eating a dead gull. Moderate body fat. Total body chlorinated hydrocarbon content: 13 mg DDT, 6·8 mg PCB, 0·07 mg dieldrin, 0·09 mg heptachlor epoxide. Total body lipid, 43 g.

‖ Adult female. Trapped in the southern San Francisco Bay area in the winter of 1966. Observed feeding in the area for a month before capture. Died shortly afterwards with no apparent cause of death and no body fat. Total body chlorinated hydrocarbon content: 52 mg DDT, 40 mg PCB, 1·0 mg dieldrin, 1·0 mg heptachlor epoxide. Total body lipid, 20 g.

¶ First year female trapped on the Texas coast in October. Lost at Pt Mugu, California, the following January and was shot by a sportsman 3 weeks later. Abundant body fat. Total body content: 7 mg DDT, 0·6 mg PCB, 0·05 mg dieldrin, 0·17 mg heptachlor epoxide. Total body lipid, 110 g.

** First year female trapped on the Texas coast in October. Died shortly afterwards of heat prostration.

In Table 1 are presented the results of analyses of peregrine falcons which died from a variety of causes

shortly after being trapped for falconry. Significant amounts of PCB were present in Arctic peregrines only a few months old (Nos. 5 and 6), but higher residues were present in a second year Arctic bird (No. 2) and exceptionally high residues were present in an adult trapped in California (No. 4). In birds 2 and 4 the total lipid reserves were very low, and in both the brain concentrations of DDE and PCB were high, perhaps at toxic levels. Fat mobilization during reproduction or in times of starvation or stress could be expected to cause significant changes in the internal distribution of chlorinated hydrocarbons. Steroid hydroxylase activity in the liver might increase at this time. Dieldrin concentrations were lower than in the peregrines analysed in Britain, but DDE concentrations were approximately comparable[24].

Table 2 presents the results of analyses of peregrine prey species, remains of which were collected at eyries in Baja California, Mexico. With the exception of the remains of one mourning dove (*Zenaidura macroura*) and of three fish bats (*Pizonyx vivesi*), prey material found at four eyries consisted of sea birds. Of these, the eared grebe (*Podiceps caspicus*) and the black petrel (*Loomelania melania*) constituted 32 and 25 per cent, respectively, of the remains.

Black petrels, like other petrels and shearwaters (Table 3), contained especially high concentrations of both DDT and PCB. Reproductive success in this population of peregrines seems to be subnormal. In 1968 no pairs were observed to hatch or fledge more than a single young. In the past, two to four young, the number normally produced by healthy peregrines[25,27], were raised by each pair (L. W. Walker, personal communication). The thickness of fragments of a peregrine eggshell, with its membrane, collected in 1968 below an eyrie where one young hatched, was 0·24 mm, a decrease of 34 per cent from the mean thickness of 0·34 mm ± 0·015 mm (95 per cent confidence level) in twenty-three eggs collected in the area before 1947. The region is wilderness, with little or no human interference, and is remote from sources of pollution.

In California, numbers of breeding peregrines have been reduced by at least 80 per cent in recent years. The remaining few pairs, however, seem to be reproducing normally and rear, when undisturbed, between two and four young each year. They are found, like most of the surviving pairs in Great Britain[21–24], in a relatively uncontaminated region and seem to be feeding on birds which contain low concentrations of chlorinated hydrocarbons. A pair which fledged three young in 1968 fed chiefly on passerines and columbiformes during the breeding season. Both prey groups are relatively uncontaminated (M. N. K., R. W. R. and S. G. H., in preparation). A clutch of eggs collected in this region weighed as much as the eggs obtained in pre-war years, whereas other peregrine eggs from California collected since the Second World War have been thin-shelled (ref. 2, and D. W. Anderson, D. Hickey and R. F. Christensen, in preparation). Despite official protection the surviving birds are still subjected to shooting by sportsmen and to harassment at the eyries. If these could be effectively reduced the population might yet survive.

In Table 3 are presented the results of analyses of marine and terrestrial birds and of three species of freshwater fishes for PCB and DDT content and concentration. From the ratio of total DDT to PCB, it is apparent that regional fallout patterns exist. In most of the birds from San Francisco Bay which have been analysed, including peregrine falcons (Table 1) and eggs of the western gull, the Caspian tern and the black-crowned night heron (Table 3), the ratio was between one and two. Another black-crowned night heron egg had a typically "ocean" profile, suggesting that the adult female had wintered along the coast. In most of the birds from the Farallon Islands, which are 27 miles west of the Golden Gate Bridge, this ratio was between 2 and 5. In the Gulf of Panama, where PCB contamination might come from the Canal Zone and industrial areas in Panama City, the ratio is between 1 and 2 (Table 3).

In the Gulf of California, a region relatively remote from the sources of either DDT or PCB contamination, the ratio was in most cases approximately 9 or 10. This was true in the egg of the peregrine falcon (Table 1), in all of the black petrels and least petrels analysed, in the Craveri's murrelets (Table 2), in five of six osprey eggs and in six of seven western gull eggs (Table 3). Among the exceptions the fish bat, with low concentrations of both DDT and PCB, was the most divergent, with a ratio of 43 (Table 2). It is not clear whether this reflects differences between avian and mammalian physiology or a fundamental difference in feeding habits. The other exceptions include species which are present in the area only during the breeding season (Table 2).

In sea birds from the Pacific the ratio was usually between 5 and 10 (Table 3). PCB was not found in eggs of the Adelie penguin from Cape Crozier, Antarctica.

Table 2. PCB AND DDT IN PREY SPECIES OF PEREGRINE FALCONS IN THE GULF OF CALIFORNIA

Species*	N	DDT (μg)	DDT (p.p.m.)	Percentage DDE	PCB (μg)	PCB (p.p.m.)	DDT/PCB
Eared grebe (13)							
Whole body	3	—	0·28, 0·26, 12·1	97	NM†		—
Black petrel (10)							
Whole body	8	810 (685–1,344)	9·2 (W)	81	—	1·0 (W) (0·90–1·14)	9·2
Least petrel (6)							
Whole body	3	99	3·2 (W)	83	—	0·35 (W)	9·3
Eggs	2	30 (23–37)	—	84	3·1 (1·2–5·0)	—	10
Fish bat (3)							
Whole body	7	25 (15–31)	0·71 (W)	62	0·58 (0·45–1·06)	0·02 (W)	43
Craveri's murrelet (2)							
Eggs (one clutch)	2	230‡ (223–238)	39 (L)	80	—	4·5 (L)	8·7
Whole body, adult	1	37·1	0·31 (W)	85	—	0·039 (W)	7·9
Whole body, adult	1	295	2·4 (W)	85	—	0·26 (W)	9·2
Elegant tern (1)							
Eggs	8	15·5 (9·6–24·3)	5·0 (L)	90	—	1·5 (L) (0·8–3·6)	3·9
Heermann's gull (1)							
Eggs	3	195 (94–278)	48 (L)	95	—	8·1 (L) (3·5–11·3)	5·9

Content in μg of whole bodies and eggs; concentrations in p.p.m. wet weight (W) or lipid weight (L).

* All specimens were collected in the vicinity of four peregrine eyries in Baja California. Numbers in parentheses are the number of remains of each prey species which were found at the eyries. Also found were remains of one cormorant (*Phalacrocorax* sp), one red phalarope (*Phalaropus fulicarius*), one northern phalarope (*Lobipes lobatus*) and one mourning dove (*Zenaidura macroura*), but local specimens of these species were not analysed. Eggs of least petrels, elegant terns and Heermann's gulls were from different clutches. Eared grebe: *Podiceps caspicus*; black petrel: *Loomelania melania*; least petrel: *Halocyptena microsoma*; fish bat: *Pizonyx vivesi*; Craveri's murrelet: *Endomychura craveri*; elegant tern: *Thalasseus elegans*; Heermann's gull: *Larus heermanni*.

† Not measured. Interfering peaks on chromatograms.

‡ Both eggs also contained 0·08 p.p.m. dieldrin (lipid weight) and 0·17 p.p.m. endrin (lipid weight).

Table 3. PCB AND DDT IN THE GLOBAL ECOSYSTEM

Species	N	Total DDT (μg)	Total DDT (p.p.m.)	Percentage DDE	PCB (μg)	PCB (p.p.m.)	DDT/PCB
White crappie (1)	1	—	1·83 (W)	6	—	0·004 (W)	475
Black crappie (2)	1	—	2·10 (W)	6	—	0·003	660
Bluegill (3)	1	—	5·5 (W)	6	—	0·005	1,200
Adelie penguin (4)							
Eggs	5	0·78 (0·59–1·04)	0·128 (L)	74	< 0·044 μg/egg		> 18
Western grebe (5)							
Breast muscle	1	—	26·4 (W)	5	—	0·098 (W)	270
Fulmar (6)							
A	1	—	0·41 (W)	76	—	0·08 (W)	5
B	1	—	3·4 (W)	89	—	0·34 (W)	10
C	1	10,475	17·5 (W)	96	3,900	6·5 (W)	2·7
Pink-footed shearwater (7)	1	2,000	3·0 (W)	93	277	0·42 (W)	7·2
Sooty shearwater (8)							
A	1	—	12·3 (W)	94	—	1·2 (W)	10
B	1	—	10·3 (W)	86	—	0·9 (W)	12
C	1	1,265	2·3 (W)	85	NM		
Slender-billed shear-water (9)	1	—	32·0 (W)	92	—	2·1 (W)	15
Ashy petrel (10)	3	2,158 (1,644–2,826)	59·3 (W)	95	389 (298–482)	9·8 (W)	5·5
Brown pelican (11)							
Eggs, Panama	6	59 (18–183)	11·5 (L)	61 (47–78)	23·1 (18–30)		1·55 (0·97–3·2)
Eggs, Baja California	2	53 (47–59)	10·0 (L)	81	10·4 (9·0–11·7)	—	6·5, 4·0
Frigate-bird (12) eggs, Panama	3	9·6, 8·7, 30·0	—	88	8·4, 5·7, 84·0	—	1·1, 1·5, 0·4
Brown booby (13) eggs, Panama	4	20·8 (16·4–24·5)	8·2 (L)	89	12·2 (6·5–18·9)	4·8 (L)	1·7
Brandt's cormorant (14) eggs	17	326	—	91	113	—	2·9
Pelagic cormorant (15) eggs	2	128 (125–130)	—	90	62 (48–75)	—	2·1
Cinnamon teal (16)	1	4,340	10·9 (W)	70	—	0·91	12
White-tailed kite (17)							
Eggs, clutch *A*	4	11·4 (9·8–12·9)	0·76 (W)	77	6·4 (5·5–7·8)	—	1·8
Unhatched egg *B*	1	5·1	0·34 (W)	82	0·84	—	6·0
Unhatched egg *C*	1	5·3	0·35 (W)	73	3·6	—	1·5
Clutch *D*	2	8·3/egg	—	82	4·3/egg	—	2·0
Clutch *E*	3	10·2/egg	9·0 (L)	57	4·0/egg	—	2·6
Clutch *F*	4	31·9/egg	—	80	3·8/egg	—	8·5
Cooper's hawk (18)	1	8,500	25·2 (W)	90	—	6·3	4·0
Golden eagle (19) egg	1	150	2·0 (W)	98	17·5	0·23 (W)	8·5
Osprey (20), Baja California	6	127 (30–264)	55 (L)	85	(7·3, 3·0, 103) (24, 7·0, 19)	—	8·5, 10·1, 1·3, 11·2, 9·7, 11·1
Merlin (21)	1	435	2·9 (W)	94	55·4	0·39 (W)	12·7
American kestrel (22)							
Whole body, adult	1	5·1	0·044	39	3·7	0·031	1·4
Eggs, two clutches	6	2·4/egg	0·20 (W)	93	1·0/egg	0·09 (W)	2·3
Black-crowned night heron (23)							
Egg	1	541	—	89	330	—	1·6
Egg	1	869	—	99	23	—	36
Western gull (24)							
Eggs, San Francisco Bay, three clutches	4	803 (632–1,123)	—	85	805 (580–1,310)	—	1·0
Eggs, Farallon Is., ten clutches	10	412 ± 102	—	89	136 ± 55	—	3·0
Eggs, Baja Calif., seven clutches	7	385 ± 230	—	97	45 ± 30	—	9·1, 10·5, 5·0, 12·3, 10·6, 10·7, 10·5
Forster's tern (25) eggs	2	665 (598–732)	—	89	114 (91–137)	—	5·8
Caspian tern (26)							
Eggs, San Francisco Bay	2	1,269 (1,216–1,322)	—	89	805 (660–950)	—	1·7
Eggs, San Diego Bay	5	1,430 (991–2,430)	—	88	1,010 (550–1,600)	—	1·4
Red phalarope (27)	1	—	0·78 (W)	79	—	0·10	8
Common murre (28) eggs	6	1,945 (932–3,621)	151 (L)	90	558 (364–1,010)	45 (L)	3·5
Cassin's auklet (29)	1	—	5·8 (W)	98	—	0·16	36
Ancient murrelet (30)	1	—	0·75	90	—	0·15	5
Rhinoceros auklet (31)	1	—	2·7	97	—	0·36	8
Mourning dove (32)	2	12·0, 33·1	0·19 (W)	77, 93	Not detected	—	—
Barn owl (33)							
Eggs, one clutch	3	27·7/egg	1·25 (W)	95	10·4/egg	0·47 (W)	2·7
Eggs, one clutch	2	143/egg	6·6 (W)	96	14·4/egg	0·66 (W)	10
Meadowlark (34)	2	21·2, 448	0·18, 3·3 (W)	77, 93	2·5, 28·1	—	8·4, 15·9

Content in μg and concentrations in p.p.m. wet weight (W) or lipid weight (L).
Unless otherwise specified, analyses were of whole bodies. Endrin and dieldrin were identified on the basis of retention times on both *QF*-1 and *DC*-200 columns.

1. *Pomoxis annularis*, 284 g, Clear Lake, Lake Co., Calif., May 1968.
2. *Pomoxis nigromaculatus*, 212 g, Clear Lake, Lake Co., Calif., May 1968.
3. *Lepomis macrochirus*, 229 g, Clear Lake, Lake Co., Calif., May 1968.
4. *Pygoscelis adeliae*, Cape Crozier, Antarctica, October 1967.
5. *Aechmophorus occidentalis*, Clear Lake, Lake Co., Calif., May 1968.
6. *Fulmarus glacialis*. *A* and *B*: Monterey Bay, Calif., November 1, 1966. *C*: Point Reyes, Calif., December 1967. Fulmars breed in Alaska.
7. *Puffinus creatopus*. Breeds in Chile. Collected in May 1968, in the Gulf of California.
8. *Puffinus griseus*. Breeds in New Zealand and Chile. *A* and *B*: Monterey Bay, November 1, 1966. *C*: Gulf of California, May 1968. NM, Not measured, interfering peaks.
9. *Puffinus tenuirostris*. Breeds in Australia. Monterey Bay, December 1966.
10. *Oceanodroma homochroa*. Farallon Islands, Calif., May 1968.
11. *Pelecanus occidentalis*. Panama eggs were collected on Isla Pacheca and Isla Pachequilla, Gulf of Panama, February 1968. One egg contained 0·06 p.p.m. dieldrin and 0·06 p.p.m. endrin, another contained 0·16 p.p.m. dieldrin and 0·07 p.p.m. endrin (lipid weight). Baja California eggs were collected at Bahia de los Angeles, March 1968. One egg contained 0·24 p.p.m. dieldrin and 1·13 p.p.m. endrin (lipid weight).
12. *Fregata magnificens*. Isla Pacheca, Panama, February 1968.
13. *Sula leucogaster*. Isla Pacheca and Isla Pachequilla, Panama. February 1968. Two eggs were analysed for dieldrin and endrin. Dieldrin: 0·08, 0·18 p.p.m.; endrin: 0·06 and 0·011 p.p.m. (lipid weight).
14. *Phalacrocorax penicillatus*. Farallon Islands, May 1967.
15. *Phalacrocorax pelagicus*. San Mateo Co., Calif.
16. *Anas cyanoptera*. San Diego, April 1968. Adult male.
17. *Elanus leucurus*. *A*: Contra Costa Co., Calif., April 1968. *B* and *C*: Contra Costa Co., May 1968, two and three young raised, respectively. *D*: Abandoned, Contra Costa Co., May 1967. *E* and *F*: Destroyed nests, Contra Costa Co., March 1968.

Table 3 (*continued*)

18. *Accipiter cooperii*. Balboa Park, San Diego, February 1968. First year female, died of trichomoniasis.
19. *Aquila chrysaetos*. San Luis Obispo Co., Calif., April 1968. Unhatched egg in nest where one young was raised. Egg also contained 4·7 μg of dieldrin, 1·9 μg of heptachlor epoxide, but no endrin.
20. *Pandion haliaetus*. Gulf of California, March 1968. One egg also contained 0·10 p.p.m. dieldrin and 0·25 p.p.m. endrin (L).
21. *Falco columbarius*. Immature, Utah, December 1967.
22. *Falco sparverius*. Adult was killed on road, Mendocino Co., Calif., December 1967. Eggs from Davis, California, 1968.
23. *Nycticorax nycticorax*. Eggs from different clutches, San Francisco Bay, May 1967.
24. *Larus occidentalis*. Standard errors, 95 per cent confidence limits.
25. *Sterna forsteri*. San Diego Bay, May 1967.
26. *Hydroprogne caspia*, 1967.
27. *Phalaropus fulicarius*. Monterey Bay, November 1, 1966.
28. *Uria aalge*. Farallon Islands, May 1967.
29. *Ptychoramphus aleuticua*. Farallon Islands, April 1966.
30. *Synthliboramphus antiquum*. Monterey Bay, November 1, 1966.
31. *Cerorhinca monocerata*. Monterey Bay, November 1, 1966.
32. *Zenaidura macroura*. San Diego, July 1968.
33. *Tyto alba*. Clutch *A* from Contra Costa Co., Calif., March 1968. Clutch *B* from Yolo Co., Calif., April 1968.
34. *Sturnella neglecta*. Davis, Calif., December 1967.

In these, however, the amount of DDT was very low; with a DDT: PCB ratio of 18, no PCB would have been detected. A larger amount of fat material from Antarctic organisms, which would contain more DDT, would therefore have to be analysed before concluding that PCB has not yet reached the Antarctic.

Individuals of species resident in industrial areas have, as expected, higher PCB levels than individuals of the same species from more remote regions. Analysis of ten eggs from ten clutches of the western gull from the Farallon Islands showed an average PCB content of 136 ± 55 μg (95 per cent confidence level). PCB content of four eggs from three clutches from an island in San Francisco Bay averaged 805 μg with a range from 580 to 1,310 (Table 3). Seven eggs from seven clutches in the Gulf of California contained 45 ± 30 μg of PCB. The DDT content of the eggs from the Farallons was not significantly different from that of the Baja California eggs.

Birds from the Gulf of California also contain dieldrin and endrin (Tables 2 and 3), but the number of analyse is as yet insufficient to compare their relative abundance with that of DDT and PCB. Despite the inability of the Shell Chemical Company to find any chlorinated hydrocarbons in the Gulf of California and at the mouth of the Colorado River[35], which drains into the Gulf, it is likely that some do enter from the Colorado River and from agricultural areas in western Mexico. A significant fraction, however, must come from the atmosphere[36], and air transport best explains the presence of PCB in remote areas. In extracts from the Gulf of California one PCB compound was present in relatively small concentrations. This compound is readily degraded by ultraviolet light irradiation in laboratory experiments, and may therefore be selectively degraded in the atmosphere. Although PCB is not soluble in water, it has a low but finite vapour pressure[37]. Incineration of materials containing PCB would greatly increase the rate of entry into the atmosphere. PCB is used in the manufacture of many industrial products, so the high amounts found in San Francisco Bay, Puget Sound[3] and San Diego Bay presumably result from direct discharge of industrial wastes into these waters and from local fallout.

The presence of PCB in the few land birds and freshwater fish analysed indicates that it is also distributed among continental ecosystems in North America. Peregrines could therefore acquire PCB, as well as the other chlorinated hydrocarbons, over all their global range. No PCB residue data are available for prey species from the Atlantic, but compounds which seem to be PCB have been isolated from seals[38]. A second year male peregrine spent the winter of 1967–68 on Isla Pacheca, Panama, where the pelican, booby and frigate-bird eggs of Table 3 were collected. The Cooper's hawk which was analysed, a species which also preys upon birds, contained high residues of both DDT and PCB (Table 3). Cooper's hawks have declined in eastern North America and in some regions have produced thin-shelled eggs[34]. Several species of raptors do not accumulate high amounts of the organo-chlorine compounds (Table 3), a result of the very low residue levels usually found in their prey. American kestrels and barn owls are common residents of California cities. The white-tailed kite, which was near extinction 40 years ago in California, is now abundant in areas where insecticide use is intense, yet because it preys primarily upon the short-lived and herbivorous vole, *Microtus*, the species accumulates very little DDT or PCB (Table 3).

Previous work[18] has shown that both DDT and dieldrin induce hepatic enzymes in the pigeon which, in an *in vitro* preparation, increase the metabolism of progesterone and testosterone. This work has now been extended to study the metabolism of oestradiol by enzymes induced by *p,p'*-DDE, technical DDT (Dupont) and PCB ('Aroclor 1262'). The experimental procedure previously described[18] was followed except that the chlorinated hydrocarbons were injected intramuscularly rather than given orally, and in the separation of oestradiol and its metabolites the solvent system used was the upper layer of a mixture of benzene: heptane: methanol: water 7:3:8:2. The strips were monitored with an autographic strip scanner. The profiles obtained for the various inducing agents are shown in Fig. 1. It will be noted that the profiles of the metabolites obtained after enzyme induction using DDE and DDT are identical, but that a different metabolite is produced by the enzyme induced by PCB. The amount of metabolites formed was calculated from the radioactivity of the peaks. The results obtained are given in Table 4.

Table 4. INCREASE OF OESTRADIOL METABOLISM BY PIGEON LIVER HOMOGENATES FROM BIRDS TREATED WITH VARIOUS CHLORINATED HYDROCARBONS

	Amount of polar metabolites formed in mμmoles
Control	29·3 ± 6·5
DDE (40 mg/kg)	76·2 ± 13·1
DDT (40 mg/kg)	93·1 ± 11·2
PCB (20 mg/kg)	160·0 ± 10·5

Each figure is the average with standard deviation of a group of four birds. In all cases 500 mμmoles of oestradiol-6,7-T (500 mCi/mmole) was present in the incubation mixture. Incubation time 30 min, weight of microsomal fraction used 300 mg. All chlorinated hydrocarbons were injected intramuscularly into the pectoral muscle 7 days before death.

Body concentrations of 40 p.p.m. of *p,p'*-DDE significantly increased the rate of oestradiol degradation by the induced enzymes in the experimental conditions. On a weight basis the PCB preparation had an oestradiol degrading potential approximately five times that of *p,p'*-DDE or technical DDT. Both DDE and PCB, which are apparently the most abundant of the chlorinated hydrocarbon pollutants in the global ecosystem, have therefore the capacity to produce sublethal physiological effects in birds.

Studies on the activity of induced enzymes in the rat at various times after a single injection of DDT or dieldrin have been made by Ghazal *et al.*[39]. He found that it took 70 days for the activity to fall to half its maximum value in the case of DDT and 15 days in the case of dieldrin. Experiments with dieldrin on pigeons

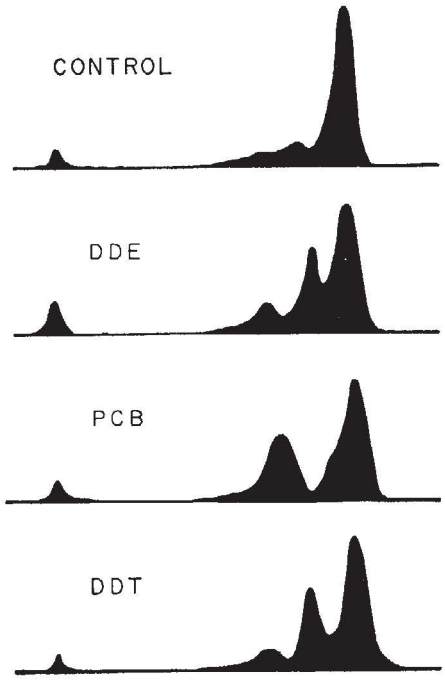

Fig. 1. Chromatographic separation of oestradiol and its metabolites. The large peak is unaltered oestradiol.

show that only a quarter of maximum activity remains after a month. Thus there is evidence that the effects of these induced enzymes can persist over a long period of time although more studies are needed to determine the steroid degrading potentials of livers of those species contaminated with chlorinated hydrocarbons. The profile of the metabolites should be some indication of the history of exposure to chlorinated hydrocarbons.

The reductions in eggshell thickness and eggshell weight increase the chances of egg breakage[21–24], and water retention, which affects hatching success[40–41], might be impaired. The environment in which birds now exist is therefore no longer the same as that in which they evolved; it is unlikely that any species has the genetic capacity to meet the selection pressures resulting from the abrupt environmental change which has produced the thin eggshells. The peregrine falcon is a species long highly revered and respected. G. H. Thayer[42] has described it as "the embodiment of noble rapacity and lonely freedom". An irony therefore exists in the fact that the peregrine may be the first species to be extirpated by global contamination.

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Tsunamis on the Moon?

by
W. G. VAN DORN
Scripps Institution of Oceanography,
University of California,
San Diego, California

The spacing of the five annular mountain rings around Mare Orientale fits a dispersion curve for gravity waves on a 50 km "liquid" layer overlying a rigid basement.

THE question whether the multiple ring-like mountain structures surrounding most of the lunar craters larger than 120 miles in diameter might be "frozen tsunamis", set in motion by the shock waves caused by impacting planetesimals, was first brought to my attention by R. B. Baldwin (personal communication). Baldwin points out that in several cases (including the giant Mare Imbrium) two or more rings can be made out

EXHIBIT I

W. R. Richard - Research Center

DATE: March 6, 1969

SUBJECT: AROCLOR WILDLIFE ACCUSATIONS

TO: E. Wheeler - EWHEE

cc: H. Bergen HBERG
J. Springate JSPRI
W. Schalk WSCHA
D. Olson DOLSO
R. Kelly RKELL
J. Garrett JGARR
P. Hodges PHODG
P. Park PPARK
R. Keller JFQ
E. Tucker JFQ

Risebrough in a recent paper "Nature", Vol. 220, Dec. 14, 1968, has attacked chlorinated biphenyls in three ways:

(1) a pollutant - widely spread by air-water; therefore an uncontrollable pollutant.

(2) a toxic substance - with no permissible allowable levels causing extinction of peregrine falcon by induced hepatic enzymes which degrade steroids upsetting Ca metabolism leading to reproductive weakness, presumably through thinner egg shells.

(3) a toxic substance endangering man himself; implying that the peregrine falcon is a leading indicator of things to come.

As outlined in Science, Vol. 163, Pg. 548, Environmental Defense Fund (EDF) is attempting to write new legal precedents in conservation law by hearings and court action. In the Wisconsin case, water quality standards are at issue. "A substance shall be regarded as a pollutant if its use results in public health problems or in acute or chronic (injury) to animal, plant or aquatic life". Wisconsin is one of 7 states which now have federally approved water quality standards. According to Bern Wright, acting chief of the Federal Water Pollution Control Administration's Water Quality Standards Branch, DDT would fit the definition of a pollutant upon a showing that it is harmful to aquatic life.

These people in EDF are saying we must not put stress on any living thing through a change in air or water environment. Eagles, plant life, anything which lives or breathes. This group is pushing hard on the extension of the word harmful. They claim "enzyme inducer" activity is the real threat of DDT and PCB's and are using these arguments to prove that very small amounts of chlorinated hydrocarbons are "harmful".

Monsanto is preparing to challenge certain aspects of this problem but we are not prepared to defend against all of the accusations.

(a) Monsanto is preparing itself to identify trace ppb quantities of chlorinated biphenyls in water samples, in concentrated collected air samples, and in animal tissues. We will know whether we have been falsely identified and accused or not. We will eventually know where any pollution is taking place and the extent of the pollution.

MONS 096509

CV96-3-0440-E
DATE 04/02/01

PLFF EXHIBIT NO. 163

(b) We are not prepared to defend ourselves against the accusations made of enzyme and hormone activity, the isolation of enzymes or metabolic products, the indirect accusation of cancer, or the splitting of genes, when this accusation is made. Whether we can defend this route or not needs further discussion.

(c) Through the Industrial Bio-Test program we are to establish the long term allowable limits of chlorinated biphenyls for certain birds-fish-animals by feeding experiments, pathological examination, and tissue analysis for chlorinated biphenyls. We may be able to answer reproductive ability in some animals.

DDT has been under attack for some years because of its chlorine content, its persistent ability to be identified, and the wildlife problems attributed to it. We will still be under the same attack by the mechanisms listed in (b) even though we might establish safe operating limits for humans and certain animals.

Where does this leave us?

Under identification and control of exposure - we will be able to identify and analyze residues as well or better than anyone in the world. We will probably find residues other than DDT and PCB's. We will probably wind up sharing the blame in the ppm to ppb concentration level.

We can take steps to minimize pollution from our own chlorinated biphenyl plants, we can work with our larger customers to minimize pollution, we can continue to set up disposal and reclaim operations. We can work for minimum exposure in manufacture and disposal of capacitors, transformers and heat transfer systems, and minimize losses for large hydraulic users.

But, we can't easily control hydraulic fluid losses in small plants. It will be still more difficult to control other end uses such as cutting oils, adhesives, plastics and NCR paper. In these applications exposure to consumers is greater and the disposal problem becomes complex. If chlorinated biphenyl is shown to have some long term enzyme or hormone activity in the ppm range, the applications with consumer exposure would cause difficulty.

Risebrough has taken known Aroclor samples and claims to have evidence of enzyme and hormone change. Here there is no question of identification. Either his position is attacked and discounted or we will eventually have to withdraw product from end uses which have exposure problems. Since Risebrough's paper in "Nature", Dec. 1968 has just been published, it is timely, perhaps imperative, that this paper and its implications be discussed with certain customers. This is a rough one because it could mean loss of business on empty and false claims by Risebrough.

Well prepared discussions with Ind. Bio-Test, Monsanto biochemists, the medical and legal departments must take place now. The

position of DDT manufacturers should be determined as a guide. We are being accused of the same things attributed to DDT.

I have written this memo to clarify some of the issues. May I please have comments.

Thanks,

W. R. Richard

ms

Att.

EXHIBIT J

Monsanto

FROM (NAME & LOCATION) W. R. Richard - Research Center

DATE September 9, 1969

SUBJECT DEFENSE OF AROCLOR - F. FLORIDA

REFERENCE

TO : E. Wheeler - EWHEE

cc P. Hodges PHODG
M. Farrar Res. 1
H. Bergen HBERG

General Policy

Make the Govt., States and Universities prove their case, but avoid as much confrontation as possible. Comply and work with public officials to meet or exceed requirements ahead of time. Adverse publicity and competition are the real weapons.

Analytical for Aroclor { In Air - Which Aroclors are present? Where? / In Water - Which compounds / In Animals - interfere? } Govt. Agencie

Keep track of how much contamination - which sources.

Prove Bioharmful - Let Govt. prove its case, on case by case basis

Monsanto Visit-Govt. Biolabs - in search of toxicological experiments and evidence vs. Aroclors to keep up with progress.

Monsanto Prove Bioharmless - Limited work at Ind. Bio-test -

"Safe" toxic level for { man / mammals via Rats / Chickens / Fish }

Seek evidence of Biodegradation
Question evidence against us.
Question shrimp toxicology especially other toxic chemicals.
If Aroclor bad, others must be worse.

Probable Outcome

We can prove some things are OK at low concentration. Give Monsanto some defense.

We can't defend vs. everything. Some animals or fish or insects will be harmed.

Aroclor degradation rate will be slow. Tough to defend against. Higher chlorination compounds will be worse ... lower chlorine compounds.

Therefore we will have to restrict uses and clean-up as much as we can, starting immediately.

DSW 014256

FORM REV 11-68

Therefore we will have to work for alternate products in end use applications; for Aroclor production facilities.

Clean Up Aroclors and substitute products where necessary and when required, before threats of publicity and competitive activity overwhelm us.

Water Pollution seems to be first issue

Aroclor product is refractive, will settle out on solids - sewerage sludge - river bottoms, and apparently has a long life.

Florida or Gulf Coast - Aroclor 1254 - Aroclor 1260 present issue.

40-200 ppb - causing problem at Pensacola (Monsanto) in plant effluent-causing " with shrimp.
- can't risk shut-down of plant.

Federal and State can extrapolate to other plants in Gulf area.

San Francisco - Aroclor 1254 and 1260

Reported Aroclor to be present in San Francisco Bay.

Reported to be thin egg shells in birds -

Lot of screaming -

Great Lakes Warf studies on DDT

Aroclor 1254 will be found!

Aroclor 1242 will be found?

Air Pollution - Possible spread - but less of an issue right now.
Analytical work more difficult.

Direct Contact with Product

Doesn't seem to be an issue - except for food heat transfer.

We don't believe Aroclor is being used as carrier for insecticide - sprayed around -

We are not positive but most uses are "closed" systems or products used in solid plastics, or adhesives, or sealants.

F. Fluids	Possible Pollution by Customers Plant Operation	Possible Pollut. by Customers Pro
Product		
Hydraulic Fluids	Yes, leakage external	Possible - See Johnson Motors Castings.
Air Compressor Fluids	Yes, leakage external	Leakage into produ
Heat Transfer	Yes, leakage external	Leakage into produ
Capacitor Fluids	Yes, leakage from plant - Scrap materials.	In product but closed for end use
Transformer Fluids	No, Should be clean. Yes, Reworked transformers	In product but closed for end use

* Capacitors can go to land fill dumps. Probably not burned, in Al containers.

** Need to take care of Aroclor in discarded transformers. Product could be drained and reworked.

Probable Conclusions

Hydraulic Leakage - Product could be caught at machines but will take a lot of clean-up work with customers. - Will have to have replacement product - with less-sensitive components. Work from this base on clean-up to prevent more pollution problems.

Air Compressor Fluids "

Hydraulic Fluids Must expect "shrimp" experiments, West Florida State, to be "aired" sometime soon; next few months.

This will lead to bad publicity and competitive action vs. all Pydrauls.

We will have to try to confine to Aroclor 1254 and Aroclor 1260.

DSW 014258

We will have to take action before that time.

Gulf Coast -

Action W. Richard	Be able to replace Aroclor 1254 and Aroclor 1260 in Pydraul AC and 625 in 2 months time before Nov. 15, 1969.
Fallon/ Richard	Have trial product in hands of Gulf Coast accounts and distributor before Dec. 15.
Fallon	Suggest possible buy of "all phosphate" ester from Food Machinery. Use this as one trial fluid MCS___ for insurance.
Richard/	Suggest possible substitution of Aroclor 5442 for Aroclor 1254 in hydraulic and compressor blends. E. Wheeler judges lower order of toxicity and solubility for 5442 series. Have to test product in pump test for deposits.
Fallon/ Richard	Suggest field trials of our own all-phosphate ester.
Fallon/ Kuhn/ Kountz	Work with large customers to clean-up streams. Bring in Findett as mfg. partner in the recycle business. Get money out of recycle operations.

Inland-Waterways-

Wheeler/ Richard	Be close enough to Great Lakes studies to judge situation. Are there animals which are being affected by the concentrations found?
Richard	Be prepared to replace Aroclor 1254 and Aroclor 1260 in 4 months in hydraulic fluids and in air compressor fluids.
Richard	Be prepared to replace all Aroclor 1242 or 1248 in 6 months in hydraulic fluids. This means replacement of Pydraul 312 series, and control of sale of Aroclor 1248 to other hydraulic accounts such as Cities Service and Mobil.

DSW 014259

Heat Transfer

Fallon/ Roush/ Kountz	Systems will have some leakage depending strongly on engineering and maintenance. Need to work with customers on clean-up.
Fallon/ Roush	Need to replace FR especially in food or sensitive product areas where the product is getting into water. See dish washer compounds. See letter E. Wheeler to T. Fallon.

We have possible replacement products in Therminol 55.
Therminol 66.

Action		
Kuhn	Try to assure adequate production of Therminol 66 in face of decreased Aroclor production. H_2 and terphenyl supply may become short. Switch customers to Therminol 55 or Therminol 66 ahead of pollution problems in customers plant. Work with customers on plant and dumping practices.	
Kuhn/ Fallon	Findett already set up to rework. Need to make them a manufacturing arm. We get sale of recycle-rework fluid.	
Capacitor Fluids	Capacitor plants have re-purification and recycle systems but up to 5% of product can be lost by poor plant producers and off-quality material.	Capacitor products Enclosed in Al or stainless steel for 5 to 25 year period.
Mkt. Benignus/ Bryant Eng.-Kountz/ Mfg-Hodges	5% of production could be 1M lbs/year. This is a big loss for the type of pollution we are trying now to guard against.	Will ultimately have to dispose of capacitor products. Recommend we try to save this product for a time.
Action	Monsanto must start to work with capacitor people to clean up plant practices. We have set-up to accept material for rework into hydraulic fluid but this relocation is not a satisfactory solution. Material must be reworked to electrical grade or destroyed, whichever is more economical. Must start now to get control of off-grade material.	Recommend replacement of future Aroclor business with other products. Have 2 years.
Eng.,TSD-Plant Pollution Control Hodges/ Kountz		
Action	Monsanto must help plant clean-up of customer plants decantation, coalescing, adsorption, disposal of adsorbent or recycle of adsorbents. Monsanto badly needs "know-how" for clean-up. Monsanto should seek Govt. contract money for clean-up research, (See MRC R. Binning, D. Nelson)	

Transformers	Transformer Plant can operate in a clean, efficient manner with recycle of off-grade Aroclor.	Product transformer can remain closed & no exposure for 25
Action Benignus/ Bryant	Should advise disposal of filter element materials so as to minimize chance of water pollution. Incinerate or dispose.	
	Reworked transformers pose a threat if the Aroclor is dumped into a water stream.	Should try to retai business by clean-u by education of cus tomers.
Action Benignus/ Bryant	Should try to minimize chance of dumping "old" fluid by re-working and by educating co. shops and collecting product for rework or disposal.	
	Dalton is set up in England to rework electrical grade fluid.	
Kuhn/Kountz Findett?	Need rework facility here + disposal scheme.	

Monsanto Plants

The Dept. of Interior and/or State authorities could monitor plant outfall and find ppm of chlorinated biphenyls at Krummrich or Anniston anytime they choose to do so. This would shut us down depending on what plants or animals they choose to find harmed.

Action - Take steps to see that every precaution is taken to prevent Aroclor entering water streams. Try to reduce to ppb level.

P.Hodges-TSD Engrg.-Kountz
Seek a Govt. contract on adsorption and incineration cycles - MRC.

Take samples of streams and river water and mud evidence for before and after clean-up. Samples can be stored for further analysis if we can't keep up current with analytical determinations.

Apply Monsanto clean-up methods to customer plant clean up equipment and procedures.

Action - Engrg. & Mfg. Kountz and Kuhn

Evaluate liquid incinerators vs. solids handling incinerators for disposing of Aroclor and pentachlorophenol wastes. I estimate Aroclor disposal at 1-4M lbs/year, exclusive of cleaning up river bottoms or outfall bottoms.

Hydraulics	20% of 4M lbs	800,000 lbs
Heat Transfer	10% of 2M lbs	200,000 lbs
Capacitors	5% of 20M	1,000,000 lbs
Transformers	5% of 15M	750,000 lbs
		2,750,000 lbs

Central Eng. & Mfg TSD

Kountz & Kuhn

Set up an incinerator to handle Aroclor disposal - preferably one which will handle solids such as muds - slurries as well as liquids. Have in operation within 12 months. Ideally have incinerators available different sections for disposal.

Possible help from MRC

Chronic Toxicity Studies - Ind. Bio-Test

Wheeler Keller Ind.Bio-Test

Continue studies to establish FDA type limits of toxicity on Aroclor 1242, Aroclor 1254 and Aroclor 1260.

Rework with R. Keller-S. Tucker the number of samples which are to be analyzed for Aroclor in tissue. Try to see if Aroclors are changed metabolically. Does concentration level off, decline if feeding is stopped?

Institute studies against the most limiting biological parameters. If shrimp are the most limiting species for Aroclor levels of toxicity, then we will have to have biological studies on these species to confirm or deny adverse findings.

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Biodegradation Studies

Swisher

Set up rate of biodegradation studies with Inorganic Div. on Aroclor 1242 vs. Aroclor 1254
Aroclor 5442 vs. Aroclor 5460
Chlorinated diphenyl ether
Chlorinated paraffin vs. chlorinated naphthalene
Chlorobromo Aroclors 1242 and 1248

Baxter
Lidgett
MCL

Contact Baxter and Lidgett at MCL regularly for results on Aroclor degradation. They are reported to be moving on laboratory experiments.

Establish contact with chlorophenol degradation studies of Cellu-Chem Group.

WRR

W. R. Richard

WRR:ms

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WRR

W. R. Richard

WRR:ms

EXHIBIT K

Elmer P. Wheeler, Medical Department

January 29, 1970

J. S. Barrett, [redacted]
[redacted]
W. B. Papageorge, [redacted]

Status of Aroclor Toxicological Studies

D. S. Cameron
Brussels

Enclosed is a copy of the reports from our consulting laboratory indicating the status of the animal toxicity studies. I have summarized the pertinent findings separately and as indicated in the table.

We have given copies of these data to one U. S. customer, the U. S. FDA and one or two other state agencies. I don't see why this information cannot be released with discretion in Britain or Europe.

Our interpretation is that the PCB's are exhibiting a greater degree of toxicity in this chronic study than we had anticipated. Secondly, although there are variations depending on species of animals, the PCB's are about the same as DDT in mammals.

We have additional interim data which will perhaps be more discouraging. We are repeating some of the experiments to confirm or deny the earlier findings and are not distributing the early results at this time.

Elmer P. Wheeler

EPW:ju

Enclosure

MONS 098480

EXHIBIT L

CONFIDENTIAL

MINUTES OF AROCLOR "AD HOC" COMMITTEE

First Meeting

Date: September 5, 1969

Present: M. W. Farrar
P. B. Hodges, Secretary
E. V. John
W. R. Richard
E. P. Wheeler, Chairman

Objectives: (Agreed to by the Committee)

Submit recommendations for action which will:

1. Permit continued sales and profits of Aroclors and Terphenyls.

2. Permit continued development of uses and sales.

3. Protect image of Organic Division and of the Corporation.

Background Discussion of Problem:

1. Agreed that we should concentrate on Aroclor 1254 and 1260. Aroclor 1242 has not yet been incriminated for these possible reasons:

   a. Nature of uses of 1242 minimizes environmental contamination.

   b. It may degrade biologically.

   c. Unless analytical techniques are performed carefully, 1242 can be destroyed by oxidation during the analyses.

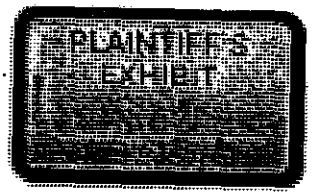
2. PCB has been found in:

   a. Fish, oysters, shrimp, birds.

   b. Along coastlines of industrialized areas such as Great Britain, Sweden, Rhine River, low countries, Lake Michigan, Pensacola Bay, in Western wild life (eagles). It may be a global contaminant.

3. PCB has been tied to DDT in effects on disappearance of wild birds which have fish diets. Ratio of PCB to DDT has been about 40-50:1 generally. Dr. Reisboro reported almost 1:1 ratio. PCB may be contributing to or exaggerating the effects of other chlorinated aromatics.

MONS 030483



4. Sample acceptance from the numerous researchers was discussed. This has been done on a limited basis. Our corroboration of testing of their samples adds to our knowledge and demonstrates a willingness by Monsanto to help define the problem, but it is expensive and also tightens any possible legal cases against us--it rules out possibilities that Aroclors are not involved.

5. Toxicity levels:

Aroclors have been shown to be safe for man in reasonable exposure concentrations. We are testing 100 ppm in diet of rats and dogs on a rule-of-thumb basis that 1/100 of toxicity level is safe and 1 ppm is probably the upper limit in total diet.

"Allowable levels" are probably lower than DDT. The worst example to date is the test at Pensacola where 5 ppb was found to be toxic to shrimp in 18 days exposure.

One problem we are facing is to keep the "safe level" (?) for shrimp from being applied to e.g. Lake Michigan where more tolerant fish species probably exist. We need to show the safe level in shrimp, clams, oysters and several species of fish.

Many toxicity studies on PCB are underway and it was agreed to be desirable to keep contact with all laboratories which have requested Aroclor samples. One-half to two-thirds of the sample requests have come from state labs (who would let us know what they are doing) and about 1/3 have come from universities (who may give us the "brush-off"). Question of who should call on the laboratories was not resolved.

6. Escambia River Problem:

For a clearer understanding of the general problem, the situation at Pensacola was reviewed. From a relatively negligible discharge of 1-3 gal/day into a large river, 1/4 mile downstream levels of 42 ppb in water and 476 ppm in mud were found. Although use of Aroclor was halted immediately, we can expect the water contamination to continue for a lengthy period by leaching from the contaminated mud. No downstream samples have yet been taken to measure the decrease in contamination (as of 9/5/69).

7. Problem in Producing Plants:

P. Hodges reviewed what was being done to stop gross losses at Anniston and at WGK. Basically, the work to date consists of stopping or trapping any sewering of free Aroclor with return to procesa or land fill disposal of the trapped Aroclor. This will reduce levels in plant effluents to below solubility ranges, particularly as we move to install traps (or sumps) back into the waste source points where flows are small and as yet undiluted by Aroclor-free waste streams. The question of exactly how far to reduce (how much money to spend) ia not yet clear and expenditures to date have been comparatively small. It was agreed that, until the problems of gross environmental contamination by our customers have been alleviated, there is little object in going to expensive extremes in limiting discharges from the plants.

One problem that has been interfering with logical development of our plant Aroclor waste reduction programs has been delays in obtaining analytical results from in-plant and ex-plant sampling. It was agreed that additional help was necessary in Dr. Tucker's lab but no specific actions were proposed. In addition to in-plant work, the plants are sampling the receiving streams.

Air pollution reduction has not been considered by the plants to date except as incidental prevention of product contamination during tank car and drum loading operations. Long range (1-2 year) improvements at Anniston are planned to reduce product contamination (and air emissions) in car loading operations. It was agreed that a comprehensive air sampling and testing program would be very expensive and is probably not justified at this stage of the problem.

8. Environmental Contamination by Customers:

Our in-plant problems are very small vs. problems of dealing with environmental contamination by customers. In one application alone (highway paints), one million lbs/year are used. Through abrasion and leaching we can assume that nearly all of this Aroclor winds up in the environment.

Because the rate of natural (bio-degradation) is very low, other degradation must destroy PCB equal to the rate of environmental exposure in order to avoid build-up of contamination.

A general discussion was held on philosophy of controlling sales or working with customers to prevent pollution by PCB.

Action Planned:

Each member of the group will submit to the other members for consideration possible ideas and programs to help accomplish the overall objectives set by the Committee. Following review of the suggestions, the Committee will meet again at an early date to be arranged by the Chairman.

P. B. Hodges
Secretary

:ju

EXHIBIT M

CONFIDENTIAL

Date: October 2, 1969

Subject: REPORT OF AROCLOR "AD HOC" COMMITTEE

To: Howard S. Bergen, Jr.
James E. Springate

From: M. N. Farrar
P. B. Hodges, Secretary
E. V. John
W. R. Richard
E. P. Wheeler, Chairman

CONTENTS

Summary of the Problem

on August 25,

OBJECTIVES

At a meeting of business group directors of Function Fluids and Plasticizers with Organic Division and Corporate Staff members, an "ad hoc" committee was appointed to prepare a resume of the situation concerning the environmental contamination through the manufacture and use of polychlorinated biphenyls (Aroclors).

The objective of the committee was to ~~propose~~ recommended actions that will:

1. Protect continued sales and profits of Aroclors;

2. Permit continued development of new uses and sales, and

3. Protect the image of the Organic Division and the Corporation as members of the business community recognizing their responsibilities to prevent and/or control contamination of the global ecosystem.

PROBABILITY OF SUCCESS

The committee believes there is little probability ~~(illegible)~~ that any action that can be taken will prevent the growing incrimination of specific polychlorinated biphenyls (the higher chlorinated--e.g. Aroclors 1254 and 1260) as nearly global environmental contaminants leading to contamination of human food (particularly fish), the killing of some marine species (shrimp), and the possible extinction of several species of fish eating birds.

Secondly, the committee believes that there is no ~~possible~~ practical course of action that can so effectively police the uses of these products as to prevent environmental contamination.

There are, however, a number of ~~possible~~ actions which must be undertaken in order to prolong the manufacture, sale and use of these particular Aroclors as well as to protect the continued use of other members of the Aroclor series.

The ultimate that can be expected is the continued use (Less than 5 Chlorines) of the lower chlorinated biphenyls and the chlorinated terphenyls in applications amenable to such control that there is practically zero losses to the environment. In the interim we would hope to establish by appropriate research efforts "tolerance" or safe levels for particular Aroclors in the environment.

- The identification is positive
- Toxicity towards certain species is high.
- Persistance is high.
- Likelyhood of natural origin or degradation is remote.

DSW 014615

RECOMMENDATIONS

OK 1. In view of legal and moral considerations, notify all Aroclor 1254 and 1260 customers of environmental contamination problem. + advising customers.

3, E. Consult with appropriate federal agencies' headquarters in Washington to determine current status of concern and to inform appropriate individuals therein of Monsanto's research and control efforts.

4, F. Personally contact all governmental and university laboratories which have requested Aroclor samples and indicated interest in the environmental contamination problem.

2, H. Reduce losses of Aroclors in liquid wastes from Monsanto plants to ~~absolute~~ minimum. Goal ~~0~~ to 25 ppb ~~10 parts per billion~~. For 1254 & 1260.

5. Determine extent of atmospheric losses from Aroclors from Anniston and WGK Plants and develop plans for control.

6. Analyze in Organic Division laboratories (or by contract) selected appropriate samples from:

   a. Environment of Anniston and WGK Plants.

   b. Monsanto products where contamination is possible.

   c. Agencies and/or laboratories attempting to pinpoint specific sources of contamination.

   d. Customer plants' environments.

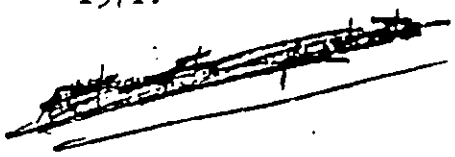
   e. Research efforts involved in biological studies--i.e. animal, bird and fish toxicity studies and biodegradation studies.

7. Expand analytical capabilities in conjunction with items 5. and 6. above.

RECOMMENDATIONS (Continued)

8. Assign one individual from the division full-time for three to six months to coordinate division and Corporate Staff department efforts.

9. Establish special budgetary account to allow implementation of these recommendations and the continuation of the toxicological research effort now underway and continuing until June, 1971.



BASIS FOR RECOMMENDATIONS

1. Notification of All Customers

Feb. On ~~September~~ 24, 1969 the San Francisco Chronicle published a "scare" story following an interview with Dr. Robert Risebrough of the University of California. The latter had recently published in Nature the finding of polychlorinated biphenyls in fish, birds and eggs in the California coastal areas.

On March 3, 1969, the Functional Fluids group sent a letter to the 31 major Aroclor customers in the transformer and capacitor applications. The letter included a copy of the Chronicle story and a Monsanto statement concerning the situation. This was intended to announce to these customers that the polychlorinated biphenyls might be in trouble and implied that the customers should make every effort to prevent loss of these materials to the environment. There has been subsequently some follow-up with at least General Electric and Westinghouse.

It has been recognized from the beginning that other functional fluid uses could lead to losses of the Aroclors to liquid waste streams from the customers' plants. Losses could occur from spills, unusual leakage of large volumes and daily losses of smaller volumes.

It has also been recognized that there could be vapor losses but it has been felt that these were perhaps of less significance than the vapor losses in plasticizer applications. The concern for vapor losses rises from the published proposed theory that even minute quantities of vapors are eventually transferred to the water environment and accumulated therein.

Another possible source of air environmental contamination is the eventual destruction of materials which have Aroclors in them. Of particular significance might be the burning or partial incineration of waste or used products containing the Aroclors.

BASIS FOR RECOMMENDATIONS (Continued)

As the alarm concerning the contamination of the environment grows it is almost certain that a number of our customers or their products will be incriminated. The company could be considered derelict, morally if not legally, if it fails to notify all customers of the potential implication.

A case in point is the recent determination (mid-~~August~~ Sept.) that milk to be marketed by the Maryland Cooperative Milk Producers, Inc. in Baltimore was contaminated with polychlorinated biphenyls. The source of the PCB's was isolated to six dairy herds in Martinsburg, West Virginia. Investigation by the Producers Association is continuing but to our knowledge the specific source of the PCB has not been pin-pointed.

When the Aroclors were indited as causing poisoning in cattle in the mid-1950's, chlorinated naphthalenes were eventually identified as the causative agent. The naphthalenes were used in greases or lubricants for cattle feed machinery and had contaminated the animal food. (Members of the Medical Department have been told that the Texas company "bought" 6,000 head of cattle around the country as a result of this incident. It is not known whether or not the suppliers of the naphthalenes to Texaco were brought into the settlement.) Are our customers selling grease or lubricants containing Aroclors that are now responsible for the milk contamination?

In the plasticizer use area, the Aroclors may be used in rubber based paints or surface coatings. The uses for these surface coatings include the interior walls of potable water supply storage tanks in some communities. In Europe we have been told that similar paints are widely used for swimming pools. In spite of the low degree of solubility of the PCB's in water, there are sentiments among the European scientists (and our PCB competitive manufacturers) that such uses may be sources of pollution.

Other customer applications or uses which could be suspect include highway marking paints, ~~and~~ any of the oil and/or grease lubricant applications, caulking compounds - sealants,

BASIS FOR RECOMMENDATIONS (Continued)

2. Consultation with Federal Agencies

In August of 1968 when the current effort related to this problem got underway, the scientists at the U. S. Department of Interior, Fish and Wildlife Laboratories at Paturent, Maryland were visited. In the six to twelve months that the laboratory had been looking for PCB residues, they had identified such compounds in dead eagles as well as marine birds. At that time they did not report positive findings in fish, shell fish or other marine organisms. We know that their efforts have been continuing at an accelerated rate but the laboratory has not been revisited to learn of current developments.

The U. S. Food and Drug Administration in Washington called Dr. Kelly in June to report that the State of Georgia had found PCB's in milk (we had in April supplied samples of our Aroclors to the Georgia State Department of Agriculture Laboratories in Atlanta).

The analyses of milk from the Maryland co-op mentioned in 1. above were performed by an FDA laboratory.

On Friday, September 26, we were asked to send samples to the Atlanta Toxicological Branch of the FDA and to the Residue Chemical Branch Division of Pesticides, FDA in Washington. The stated reason for the request was for these laboratories to determine the "acute toxicity" of Aroclors 1254 and 1260.

In the past year we have had request for samples from five or six of the regional laboratories of the Federal Water Pollution Control Administration--an agency within the U. S. Department of Interior. We have not had an opportunity to follow-up with these laboratories as to their interest or concern.

In August a laboratory of the Bureau of Commercial Fisheries, Department of Interior, at Pensacola, Florida, reported finding PCB's in the river below our Pensacola Plant. Subsequently, they reported that 5 parts per billion of Aroclor 1254 killed baby shrimp in 18 days. There has been no follow-up by St. Louis based personnel since our Pensacola Plant discontinued the use of Pydraul AC.

BASIS FOR RECOMMENDATIONS (Continued)

Appropriate individuals in the parent federal agencies should be visited to determine their current activities and concern and, secondly to make these agencies aware of Monsanto's interest, research and control efforts.

3. Contact with other Governmental and University Laboratories

In addition to the above, Monsanto has provided samples of the Aroclors to 30 or 40 other governmental and university laboratories or scientists. It would be prudent and appropriate for someone from Monsanto to personally follow-up the supplying of the samples and determine the status of the efforts of these groups. For example, the State Department of Agriculture Laboratory in Hartford, Connecticut reported in July that they had found PCB in fish off the coast of Connecticut. This led to two articles in the Hartford Times and a five minute radio program through a syndicated outlet of 108 radio stations.

4. Losses from Monsanto Plants

Efforts to reduce the losses of Aroclors in liquid wastes from the Anniston and WGK Plants are completed or underway. It is impossible to establish a limit as to what can be discharged "safely". Investigation has shown that the waters in receiving streams below the Anniston Plant contain significant (parts per million) concentrations of PCB. More ominous perhaps is the fact that sediment in the bottom of these streams miles below our plants may contain up to 2% Aroclor.

To prepare for the eventual publication in the press of the discharge of PCB's in Alabama and to the Mississippi River, a significant effort must be made to determine the present levels of contamination and more importantly, determine the levels of contamination as "clean up" procedures begin to show an effect.

The incident at the Monsanto Plant at Pensacola indicates that all Monsanto Plants using Aroclors should be made aware of the potential problem and efforts made to eliminate any losses. The significance of "any losses" may be related to the one to three gallons per day which was being lost at the Pensacola Plant.

BASIS FOR RECOMMENDATIONS (Continued)

Hopefully research efforts will indicate that a "safe level" of losses would be higher in fresh water streams not adjacent to coastal estuaries. At the present time we know of no claims that the PCB's are "destroying" fish.

5. Atmospheric Losses at Anniston and WGK

The determination of atmospheric losses for our Aroclor manufacturing plants will be more tedious and time consuming than in the case of liquid wastes. We will never be prepared to discuss intelligently potential problems of our customers where there may be atmospheric losses until we have some data on our own plants. This is particularly true if we ever expect to recommend to our customers measures for control of atmospheric losses.

6. Analytical Capabilities (a. through e. inclusive)

In each of the recommendations 2. through 5. above, there is the implication that Monsanto's best interest could be served by appropriate sampling and analysis. In connection with any of the governmental and other laboratories, we must accept their reported analytical results or in specific instances offer to run duplicate analyses to confirm for ourselves the validity of the reported results.

The committee agrees that to perform analyses that would confirm all of the reported findings represents an unreasonable cost in terms of personnel and facilities. At the same time there appears to be no alternative to the acceptance in the last three months that confirmation analysis in selected cases should be done. This has led to an accumulation of a backlog of samples which need attention. Delays in analysis are occurring because of shifting priorities for samples as they are received or as they have been retained.

A case in point is the delay in analyzing thirteen samples from the Inorganic Division. Samples were submitted following the finding that five of five commercially available electric dishwashing compounds analyzed showed the presence of PCB's. The Inorganic Division can not exonerate the products it sells to the detergent manufacturers until it has some data showing whether or not Monsanto supplied materials are contaminated. In the meantime Inorganic Division Quality Control has

BASIS FOR RECOMMENDATIONS (Continued)

suggested to its Division Engineering that future designs for making detergent components insure that the use of Aroclors will not permit contamination. Secondly, it is obvious that the Division cannot approach its detergent manufacturing customers about their potential problem until the above data indicate that "our own skirts are clean".

This week it was agreed that milk and water samples from the Maryland co-op in Baltimore should take precedence over other samples which had been scheduled.

In summary, the committee believes there will be a growing number of samples from the following:

a. Environment of Anniston and WGK Plants.
b. Monsanto products where contamination is possible.
c. Agencies and/or laboratories attempting to pin-point specific sources of contamination.
d. Customer plants' environment.
e. Research efforts involved in biological studies--i.e. animal, bird and fish toxicity studies and biodegradation studies.

7. Expansion of Analytical Capabilities

The recommendation to expand the analytical capabilities is a necessity in view of the preceding recommendations.

8. Assignment of Full-Time Effort

Up to this time the coordination of the Division effort has been principally the responsibility of W. R. Richard and E. P. Wheeler with support from R. E. Keller and Cumming Paton. Each of these individuals has other responsibilities to the extent that, although the Aroclor problem may have been a predominant issue, other areas of interest could not be slighted.

The committee believes that the problem is of sufficient seriousness to warrant the full concentration of at least one individual for the next three to six months. Those who have been involved up to this point would obviously continue in their

BASIS FOR RECOMMENDATION (Continued)

supporting efforts where the individual's background or expertise would make it appropriate. For example in connection with the follow-up with the federal agencies in Washington, Dr. Kelly would expect to be present for any contact with USFDA officials.

Other members of the Medical Department would be made available for contacts with the pollution control agencies or those laboratories or universities where toxicity appears to be of interest or concern.

Certainly Dr. Keller and Scott Tucker should accompany anyone making visits where the specific question of analytical techniques was to be discussed.

This still leaves a number of man months to be devoted to the other laboratories or agencies which have up to this point not made their specific interest known.

Equally if not more important is the effort which must be made relating to the contacts with customers. The committee does not believe that this can be handled by district marketing representatives without supplying such "local" individuals with a complete background of the problem.

9. Budgetary Considerations

The committee recognizes the restrictions placed on those currently involved by mandates to operate within normal or proposed reduced budgets. It should be clear, however, that the product groups, the Division and the Corporation are faced with an extraordinary situation. There can not be too much emphasis given to the threat of curtailment or outright discontinuance of the manufacture and sales of this very profitable series of compounds. If the products, the Division and the Corporation are to be adequately protected, adequate funding is necessary.

EXHIBIT N

Monsanto

FROM (NAME & LOCATION) N. T. Johnson St. Louis

DATE February 16, 1970

SUBJECT

REFERENCE POLLUTION LETTER

TO

P. Craska - Wilmington
C. Clay - St. Louis
J. H. Davidson - Los Angeles
R. A. Damiani - Chicago
G. F. Fague - Detroit
R. A. Garcia - Akron
R. Garnsworthy - Melbourne
J. A. Heilala - Akron
R. Irwin - Houston
J. S. Pullman - New York
J. J. Roder - Chicago
R. Giles - Melbourne

cc:
P. J. A. Marsh - Brussels
R. Enrhardt - New York
T. W. Oneson - Montreal
J. N. Haggart - Brussels
V. Morse - St. Louis
J. Brydon - Montreal
R. Graham - New York
P. G. Benignus
J. G. Bryant
D. E. Roush
J. R. Fallon
D. A. Hall
D. R. Pogue
D. F. Smith
D. A. Olson

Attached is a list of questions and answers which may be asked of you by customers receiving our Aroclor-PCB letter. You can give verbal answers; no answers should be given in writing. If the customer asks a question you can't answer or if he wants an answer in writing, then send his questions to me and we will answer from here.

We want to avoid any situation where a customer wants to return fluid. The new reformulated products will be available within a month. We would prefer that the customer use up his current inventory and purchase Pydraul 625A, Pydraul ACA, Pydraul ACA Winter Grade and Pydraul 540A when available. He will then top off with the new fluid and eventually all Aroclor 1254 and Aroclor 1260 will be out of his system. We don't want to take fluid back. Sell him the replacement.

We must be very positive in our approach with each customer relative to our decision to eliminate the use of Aroclor 1254 and Aroclor 1260 in our Pydraul products. We (your customer and Monsanto) are not interested in using a product which may present a problem to our environment. We certainly have no reason to be defensive or apologetic about making this change. The decision to change makes good sense and our customers should commend us, not criticize our actions. No one has forced us to make this

change. We have done it to keep our customers out of possible trouble. They should appreciate our effort, and stay with us as a customer on the reformulated Pydrauls. To make this change has cost us research monies and time. Fortunately, we possess the technical skills to make a change in our formulations without affecting the performance of products. Be positive, Take the offense. Don't let a customer or competitor intimidate you. I doubt if our competitors know whether their product could present a problem to our environment. You might ask your customer, if he has ever asked Houghton or Stauffer, Carbine, etc. about the effects of their products.

We should also recognize (point this out to your customer) we must clean-up. The Chemical Week article gives him an idea of laws in effect in his state. Read this yourself. Be familiar with the data on each state in which your customers are located. Use this in your discussions.

We have no replacement products for Aroclor 1254 and Aroclor 1260. We will continue to make these products; however, customers will have to use their own judgement on continued use.

We can't afford to lose one dollar of business. Our attitude in discussing this subject with our customer will be the deciding factor in our success or failure in retaining all our present business. Good luck.

(We have also attached a copy of the letter sent to transformer customers.)

N. T. Johnson

lb

EXHIBIT O

bcc: W. R. Richard
Tom Ford
H. S. Bergen
J. E. Springgate

March 24, 1969

Mr. Harry Chatfield
Los Angeles County Air Pollution
Control District
434 South San Pedro Street
Los Angeles, California 90013

Dear Mr. Chatfield:

Enclosed is a copy of the physical properties of our Aroclor compounds I promised you by phone. We have added the oral and skin absorption toxicity to the bottom of this list to give you some idea of the relative toxicity of these compounds. You will notice that they are not particularly toxic by oral ingestion or skin absorption. In addition, I have enclosed a copy of a paper that was printed in the American Industrial Hygiene Association quarterly in June, 1956. This paper discusses the vapor toxicity of Aroclor 1242 and Aroclor 1254. As I told you on the phone the 12 prefix in this case means biphenyl and the 42 or 54 suffix in this case represents 42% and 54% chlorine by weight, respectively.

We at Monsanto cannot understand the origin of the materials reported in the recent newspaper articles on the West Coast. These compounds are utilized generally in enclosed systems and very little would normally be expected either in the air or in the liquid discharges from a using industry.

If we can provide you with any additional data we would be glad to do so.

Sincerely,

Jack T. Barrett
Manager, Pollution Abatement
and Industrial Hygiene

JTB:cjs
Enclosures

EXHIBIT P

Monsanto

ORGANIC CHEMICALS DIVISION

Monsanto Company
800 N. Lindbergh Boulevard
St Louis, Missouri 63166
Phone. (314) 694-1000

March 27, 1969

Mr. Fred H. Dierker
Executive Officer
State of California-Resources Agency
San Francisco Bay Region
Regional Water Quality Control Board
364 Fourteenth Street
Oakland, California 94612

Ref: File No. 2119-1075

Dear Mr. Dierker:

This letter is written in response to your letter dated March 7, asking several questions concerning polychlorinated biphenyls ("PCB") manufactured by Monsanto. Responses to each of your questions are set forth below, numbered in accordance with your letter.

1. We have recently contracted with a consulting laboratory to undertake fish toxicity studies on PCB's. Because of the low solubility of PCB in water, it may be difficult to obtain a 96-hour TL_m. Depending upon the results of the initial studies, we may conduct 30-day exposure experiments.

2. Attachment A shows the general physical characteristics of PCB. Information set forth on the bottom of these pages shows the results of acute animal toxicity studies showing the oral LD_{50} in rats and the minimum lethal skin dose when applied to rabbits. You will note that these results were obtained using undiluted samples or as a corn oil suspension solution depending on the viscosity and solubility of the materials.

3. & 5. Attachment B shows the results of studies of chronic inhalation. You will note in the table describing the properties of various PCB's that the liquid materials have extremely high distillation ranges and that waxy or resinous materials have to be distilled under high vacuum. These data attest to the low vapor pressure of the materials at ambient temperatures.

PCB finds primary use in applications requiring chemical stability, good dielectric properties, fire resistance, low volatility and water insolubility. When used in dielectric fluid, PCB is hermetically sealed in capacitors and transformers, designed for 20 to 30 years life at temperatures at or near ambient temperatures.

Plasticizer PCB is found primarily as a plasticizer for surface coatings such as corrosion resistant paints, industrial adhesives and as a sealant such as window sealants. These applications do not include automobile tires, or floor tile. These applications of PCB emphasize its inertness and low volatility to provide long service life for the product without loss of flexibility. In normal use, PCB plasticizer applications are ambient temperature environments presenting no special health problems. In view of PCB's chemical inertness, we would anticipate no problems associated with the environment from refuse dumps.

PCB finds further application in industrial (excluding aviation) hydraulic and heat transfer systems. As in the case of dielectric applications, these systems are designed for essentially indefinite fluid life.

4. PCB is essentially insoluble in water, which is a property valued for most of its industrial applications. The solubility of PCB varies with the number of chlorine atoms. Solubility in tap water at 25°C. is as follows:

Material	Solubility in Water
PCB - (42% chlorine by weight)	203 ± 10 ppm
PCB - (48% " " "	106 ± 14 ppm
PCB - (54% " " "	50 ± 2 ppm

This data indicates that the most highly chlorinated PCB's are the least soluble in water. Annual consumption in the Bay Area is less than 500,000 pounds for all PCB applications.

6. It is a long standing policy at Monsanto not to disclose information concerning our customers, including the customer's name. However, we desire to cooperate with you to the fullest extent practicable in this matter. Should you desire to visit typical PCB users we will be happy to approach our customers to arrange a visit.

7. We advise persons using PCB products to take normal precautions associated with handling most synthetic materials. If accidentally spilled on hands, no serious skin irritation should occur. However, PCB has a solvent action (similar to paint thinner) on the fats and oils of the skin and prolonged contact may lead to drying and chapping of the skin.

   In the event of contact, the skin should be washed with soap and water. Saturated clothing should be removed and dry cleaned. Spills may be cleaned up with rags, sawdust or absorbent clay. Eye contact may result in painful irritation but should cause no permanent damage to tissues. In the event of eye contact, the eye should be flushed with large amounts of water. As with all eye first-aid, a physician should be consulted. To relieve irritation, physicians have used a 1% Pontocaine as well as ophthalmic cortisone acetate solution, or castor oil.

   Infrequent exposure to PCB vapor should not cause ill effects. However, prolonged exposure to high vapor concentrations should be avoided.

After many years of experience with PCB, it is our understanding that cases of harmful effects resulting from the industrial use of PCB have been extremely rare. We believe this is due largely to low volatility which reduces possible inhalation at ambient temperatures.

We sincerely trust that this answers the questions contained in your letter. As further information becomes available in which we feel you might be interested, we will pass such information on to you.

Yours very truly,

for Howard S. Bergen
Director, Functional Fluids

HSB:pep
Attachments
BCC: P. S. Park
R. Wheeler/J. Garrett
D. A. Olson
P. Benignus
W. Waychoff
D. Pogue
N. T. Johnson
W. R. Richard

EXHIBIT Q

Monsanto

JUN 2 1969

FROM (NAME & LOCATION) E. P. Wheeler

DATE May 26, 1969

SUBJECT

REFERENCE

TO W. R. Richard

cc R. E. Keller
E. S. Tucker
H. S. Bergen
J. E. Springgate
C. Paton
W. A. Kuhn
P. B. Hodges
Dave Nelson - MRC

Dave Nelson of MRC called me today to relay the following information:

1. A Mr. Bob Day in the Cincinnati Laboratories of the National Air Pollution Control Administration had called him and asked for any information Monsanto might have relating to what might happen to chlorinated biphenyls in products that might be incinerated. Day indicated that he needed the information for "his boss" John Ludwig, assistant commissioner of NAPCA in Washington by Monday, May 26.

   After trying to reach Day and finding busy circuits I called John Ludwig directly since I know him personally. Ludwig was surprised and said if the question of PCBs had come up he had forgotten it or at least didn't remember that he wanted an answer by next Monday. He offered to have Day call me directly but I told him that I would get through to Mr. Day.

   I did reach the latter and after much discussion it turned out that some member of Congress had sent a letter directly to the NAPCA offices in Washington asking what NAPCA knew about distribution of PCBs by incineration and Ludwig had passed the letter on to Cincinnati to get information for a reply.

   Mr. Day was under the same misconception as so many others concerning the widespread situation of PCBs in such things as automobile tires. I set this matter straight quoting from the company prepared statement. We then got into some detail because it became apparent that Day was not a "Knight on a White Horse" but was reasonable and objective. As we chatted further and expanded comments about mutual acquaintances, Day finally told me that he is a Monsanto employee from Pensacola fulfilling his millitary commitment as a member of the Commission Corps. in the Public Health Service.

   He indicated that the laboratory in Cincinnati may try to set up a program where waste materials containing PCBs will be incinerated (in one of the several experimental incinerators which they have there) and analyze the decomposition products. He asked if Monsanto would be in a position to provide wastes or

plastic materials containing Aroclor which they could use in their experiments. I offered to cooperate in any way we could.

He will send word back to Washington which will then be related to the member of Congress that the PCBs are not used in some of the applications which have been indicated in the public press and in general try to present Monsanto's views to wit: "We can not conceive how the PCBs can be getting into the environment in a widespread fashion and that the company is actively involved in research programs to try to shed some light on the situation."

2. Dave Nelson attended a meeting at the Federal Water Pollution Control Administration Laboratory in Athens, Georgia recently to see if there were areas where MRC could bid on government grants for research in connection with pesticide residues.

Dave says that in the course of the meeting some of the FWPCA boys raised the question as to what Monsanto at Anniston, Alabama does to control the escape of polychlorinated biphenyls or waste products getting out of the plant. Obviously Dave would not have any of the details of our programs at Anniston but passed this word on to me with the thought that we can anticipate that the Feds will be looking at creek, river or lake water and mud samples below Anniston for PCBs.

EPW

Elmer P. Wheeler

cs

EXHIBIT R

July 23, 1969

Mr. A. Bruce Pyle
Assistant Bureau Chief
Department of Conservation
and Economic Development
P. O. Box 1809
Trenton, New Jersey

Dear Mr. Pyle:

In connection with your recent request for more specific information on PCB, I have enclosed several items that may be of interest.

The first is a table showing the physical characteristics and properties of our Aroclors, the trade name for our polychlorinated biphenyls.

The numerical designation of these materials is meaningful. The 1200 series are biphenyls chlorinated to the extent indicated by the last two numerals. For example, Aroclor 1242 is biphenyl chlorinated to the extent of 42%; Aroclor 1254 is biphenyl chlorinated to 54%.

The 5400 series are terphenyls chlorinated to the extent of the last two numerals. Thus Aroclor 5460 is terphenyl chlorinated to 60%. The 2500 and 4400 materials are mixtures of biphenyls and terphenyls chlorinated to 65%.;

We have typed on the bottom of the table the results of acute toxicity studies. These indicate the approximate lethal dose in rats when administered orally and the minimum lethal dose when the samples were applied to the unbroken skin of rabbits. You will note that the samples were administered undiluted or as various concentrations in corn oil depending on the physical form and solubility of the sample.

The second enclosure refers to the only published data that we now have concerning possible toxicity to fish. This enclosure is a 1957 report from the U. S. Fish and Wildlife Service showing the results of studies to determine the possible effects of chemicals to larval lampreys and fishes. The enclosure includes a copy of the title page, the page explaining the table and that portion of the table which indicates that four of the Aroclors have no effect on trout, bluegill and larval lampreys at a concentration of 5 ppm in a 24 hour test period.

The only chronic toxicity data that we have refers to the inhalation of vapors of Aroclor 1242 and 1254. Enclosure three is a reprint describing the chronic inhalation studies and enclosure four is a Hygiene Guide published by the American Industrial Hygiene Association which prescribes safe handling techniques for the use of these materials in industry.

Based on available data, manufacturing and use experience, we do not believe the polychlorinated biphenyls to be seriously toxic. At the same time we have also recommended precautions to avoid repeated and prolonged skin contact and secondary avoidance of inhalation of vapors when the materials are heated. As indicated by the distillation ranges in enclosure one, these products have extremely low vapor pressure and thus present little vapor inhalation hazard at ambient temperatures.

I don't know that I can add a great deal to your question to the use of these materials without repeating the comments in the statement which Tom Ford sent you. Their dielectric characteristics lead to usage as insulating fluids for transformers and capacitors. Transformer application is in sizes applicable to sub-stations rather than the small transformer on lines for reducing voltage for household use.

The plasticizer type application PCB's are incorporated into a polymer as an integral part of the solid material. This is the case whether the polymer is then used as an adhesive special elastomer or individual surface coating.

Contrary to some reports from the press, the PCB's are not used in rubber tires, lipstick, or the common plastic containers or films used for industrial or household packaging.

We have a considerable research effort underway to determine the toxicity of several of the PCB's in rats and dogs. We are also including three generation reproduction studies in rats. Also underway are studies with fowl to determine the possible chronic effect on the birds themselves, egg size and production, hatchability of the eggs and viability of the chicks. We will also do studies to determine any possible effect on egg shell thickness and calcium and phosphorus metabolism.

We have attempted to establish a program for determination of the possible biodegradation of the polychlorinated biphenyls but research of this type is not yet underway.

Re-emphasizing a point we attempted to make in the statement Tom sent you, we are unable at this time to conceive of how the PCB's can become wide spread in the environment. It is certain that no applications to our knowledge have been made where the PCB's would be broadcast in the same fashion as the chlorinated hydrocarbon pesticides have been. I am sure there will be much more research undertaken to clarify some of the questions that early research efforts have raised and you may be sure that we will participate in a number of these.

If I can be of any further assistance after you have reviewed this letter and the enclosures, please let me know.

Sincerely,

Elmer P. Wheeler
Manager, Environmental Health

EPW:ju